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August 2, 2024

**Via Email [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org)**

City of Los Angeles  
Planning and Land Use Management Committee  
200 N. Spring Street  
City Hall, Room 395  
Los Angeles, CA 90012

Re: 3601-3615 Mission Road/2010-2036 Lincoln Park Avenue  
ENV-2022-6190-CE  
Council File No. 23-0796  
Hearing Date: August 6, 2024  
Agenda Item No. 13  
**Support for Project Approval**

Dear Chair Harris-Dawson and Honorable Committee Members,

This office represents Lincoln Park Holdings, LLC (the “Applicant”) in matters relating the pending appeal of Case No. ENV-2022-6190-CE. The purpose of this correspondence is to provide support for denial of the appeals and upholding the CEQA determination of the Los Angeles City Planning Commission.

**I. Background.**

At its meeting of May 25, 2023, the Los Angeles City Planning Commission (“CPC”) approved a Conditional Use Permit, Density Bonus Compliance Review, Zoning Administrator’s Adjustment, and Site Plan Review to permit a housing development project consisting of 184 dwelling units with 47 units reserved for Very Low Income Households at the Property (the “Project”). The CPC also found that the Project qualifies for a Class 32 Categorical Exemption under CEQA as an infill development.

The CPC’s approval of the requested entitlements has become final. As such, the only issue before the Committee is whether the CPC’s adoption of the Class 32 Categorical Exemption was correct. As detailed below, substantial evidence supports that the Project qualifies for this exemption and the pending appeal must be denied.

## **II. The Housing Accountability Act Mandates Denial of the Appeals.**

The Housing Accountability Act (“HAA”) serves to limit a local government’s ability “to deny, reduce the density for, or render infeasible housing development projects...” Gov. Code Section 65589.5(a)(2)(K). Notably, the HAA lays blame for the state’s housing crisis on the “...activities and policies of many local governments that limit the approval of housing, increase the cost of land for housing, and require that high fees and exactions be paid by producers of housing.” Gov. Code § 65589.5(a)(1)(B). The legislature has repeatedly amended the HAA in recent years to strengthen the limitations on such local governments, including most recently, AB 1633, which expands the definition of project denial to include the failure to make the determination that a project is exempt from CEQA when substantial evidence in the record supports the exemption. Gov. Code § 65589.5(h)(6)(D)(1).

The HAA states that “[w]hen a housing development project complies with applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time the application was deemed complete but the local agency proposes to disapprove the project or to impose a condition that the project be developed at a lower density,” such denial can only occur if the local agency can make two findings that cannot be made here. Gov. Code § 65589.5(j)(1). As a threshold matter, a housing development project shall be deemed compliant with applicable standards “if there is substantial evidence that would allow a reasonable person to conclude that the housing development project...is consistent, compliant, or in conformity.” (Gov. Code Section 65589.5(f)(4).)

The two findings required for a project denial pose a high burden on local governments. First, the local government must find that “[t]he housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. Gov. Code §65589.5(j)(1)(A). The HAA further states that a “‘specific, adverse impact’ means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” Gov. Code § 65589.5(j)(1)(A). The HAA “thus imposes mandatory conditions limiting [a city’s] discretion” to deny permits. North Pacifica, LLC v. City of Pacifica (2002) 234 F.Supp.2d 1053, 1059.

Second, the local government must also find that “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to [the above-discussed finding in Section 65589.5(j)(1)(A)], other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.” Gov. Code § 65589.5(j)(1)(B). Further serving to limit the authority of local governments, the HAA requires that both of such findings be “supported by a preponderance of the evidence on the record...” Gov. Code § 65589.5(j)(1).

**A. The HAA Applies to the Project Because the Project Complies with Applicable, Objective General Plan and Zoning Criteria.**

As specifically found by the CPC, there is no dispute regarding the Project's consistency with the applicable general plan and zoning standards and criteria in effect at the time the application was deemed complete. The Project site is located in a highly urbanized area and is adjacent to properties zoned for open space, public facility, and medium residential uses, and will provide housing opportunities for a diverse sector of the community. As detailed by the CPC, the Project advances a number of specific goals and objectives of the Northeast Los Angeles Community Plan and is consistent with other elements of the General Plan, including the Framework Element, the Housing Element, and the Mobility Element.

Further, by operation of law under the HAA, the City may no longer assert that the Project is not compliant with applicable, objective general plan, zoning, and subdivision standards and criteria as the HAA provides a strict 60-day timeline for the City to raise any objections regarding such a determination.

“If the local agency considers a proposed housing development project to be inconsistent, not in compliance, or not in conformity with an applicable plan, program, policy, ordinance, standard, requirement, or other similar provision...it shall provide the applicant with written documentation identifying the provision or provisions, and an explanation of the reason or reasons it considers the housing development to be inconsistent, not in compliance, or not in conformity as follows: ... ***Within 60 days of the date that the application for the housing development project is determined to be complete, if the housing development project contains more than 150 units.***” (Gov. Code § 65589.5(j)(2)(A); emphasis added.)

The HAA states the consequences of the City failing to provide applicants with such required documentation is that “the project shall be deemed consistent, compliant, and in conformity with the applicable plan, program, policy, ordinance, standard, requirement, or other similar provision.” Gov. Code § 65589.5(j)(2)(B).

As the City never provided the Applicant with a written determination detailing any alleged Project inconsistency within the prescribed time limits, by operation of law, the Project is deemed consistent with any applicable plans, programs, policies, ordinances, standards, requirements, or other similar provisions. Gov. Code § 65589.5(j)(2)(B). Such conclusion is further consistent with the HAA, which requires that its provisions “...be interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing.” Gov. Code § 65589.5(a)(2)(L).

Accordingly, since the City cannot demonstrate that the Project does not comply with “applicable, objective general plan and zoning standards and criteria, including design review standards,” the City may not deny the Project without making the findings required by Gov. Code § 65589.5(j). Honchariw v. County of Stanislaus (2011) 200 Cal.App.4th 1066, 1081 [County failed to make required findings or otherwise demonstrate how the proposed project failed to comply with applicable, objective general plan and zoning standards and criteria, including design review standards].

As discussed below, the City cannot make either of the required findings for denial of the Project.

**B. The City Cannot Make Either of the Findings Required Under the HAA in Order to Deny the Project.**

Since the HAA applies to the Project, City Council can only deny the Project if it finds that the Project “would have a specific, adverse impact upon the public health or safety” and “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact identified...other than the disapproval of the housing development project...” Gov. Code § 65589.5(j)(1). Further, both findings must be based on the “preponderance of the evidence on the record.” Gov. Code § 65589.5(j)(1). A “preponderance of the evidence” poses a high bar for the City, requiring that the evidence in favor of the finding has more convincing force than that opposed to it. People v. Miller (1916) 171 Cal. 649, 652. The City cannot meet this high bar.

As noted previously, the term “specific, adverse impact upon the public health or safety” means “a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” Gov. Code § 65589.5(j)(1)(A). The legislature has expressly stated that such “specific, adverse impact” may only be found in extraordinary cases, stating that “[i]t is the intent of the Legislature that the conditions that would have a specific, adverse impact upon the public health and safety [as used in Gov. Code § 65589.5(j)(1)] *arise infrequently*.” Gov. Code Section 65589.5(a)(3); emphasis added.

Here, there is no evidence in the record to support a finding that the Project “would have a specific, adverse impact upon the public health or safety,” much less enough evidence to meet the high bar of a “preponderance of the evidence on the record” required to support such a finding. Gov. Code § 65589.5(j)(1). While the “specific, adverse impact” language in Government Code § 65589.5(j)(1) does not directly implicate “significant impacts” as the terms is used within the context of the California Environmental Quality Act, as found by the CPC, the Categorical Exemption document for the Project provides the full analysis and justification for project conformance with the definition of a Class 32 Categorical Exemption, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines § 15300.2 applies.



As detailed in below, the Appellants have claimed that the Project will cause a laundry list of impacts. However, their claims are not substantiated by substantial evidence. See Gentry v. City of Murrieta (1995) 36 Cal.App.4<sup>th</sup> 1359, 1417 [“[I]n the absence of a specific factual foundation in the record, dire predictions by nonexperts regarding the consequences of a project do not constitute substantial evidence.”]; Perley v. County of Calaveras (1982) 137 Cal.App.3d 424, 436-437 [unsubstantiated fears and desires of project opponents do not constitute substantial evidence].

If the City cannot make a finding of a “specific, adverse impact,” then it may not deny the Project. Sequoiah Hills Homeowners Association v. City of Oakland (1993) 23 Cal.App.4th 704, 716 [“Thus, the only way appellant can avoid the impact of section 65589.5, subdivision (j)(1), is by establishing that the project, at the approved density, will have a ‘specific, adverse impact upon the public health or safety.’ This they cannot do. There is no evidence to support such a conclusion, and the city specifically found that no such impact would result from the project.”].

Even assuming that the City could find that the Project had a specific, adverse impact upon the public health or safety (which it cannot), the City could not find, by a preponderance of the evidence, that “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact identified...other than the disapproval” of the Project. Gov. Code § 65589.5(j)(1). To date, the City has made no effort with respect to this required finding for a denial of the Project and has certainly not produced the “preponderance of the evidence” necessary to support such finding.

Since the City has not, and cannot, make either of the required findings based on a preponderance of the evidence, the HAA prohibits the City from denying the Project.

**C. If the City Denies the Project, a Court May Issue a Writ Compelling the City to Approve the Project and Pay Attorneys’ Fees.**

Should the City deny the Project, the HAA permits the Applicant to bring a writ of mandate action pursuant to Code of Civil Procedure Section 1094.5. Gov. Code §65589.5(m). If the court finds that the “[t]he local agency...disapproved a housing development project complying with applicable, objective general plan and zoning standards and criteria, or imposed a condition that the project be developed at a lower density, without making the findings required [by the HAA] or without making findings supported by a preponderance of the evidence” in “bad faith,” then the court may issue an order compelling the local agency to approve the housing development Project. Gov. Code Section 65589.5(k)(1)(A).

Further, the court “*shall* award reasonable attorney’s fees and costs of suit to the plaintiff or petitioner, *except under extraordinary circumstances* in which the court finds that awarding fees would not further the purposes of [the HAA].” Gov. Code § 65589.5(k)(1)(A)(ii) (emphasis added.)

### **III. The CEQA Determination.**

#### **A. The Project Qualifies for a Class 32 Infill Development CE**

As mandated by Public Resources Code Section 20184, State CEQA Guidelines (the “Guidelines”) Section 15300 includes a list of classes of projects which are exempt from CEQA because they have been determined to not have a significant effect on the environment. The Class 32 Infill Development Categorical Exemption (“CE”) is included on that list. The Guidelines Section 15332 applies to “Infill Development Projects” and specifically provides:

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

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*
- (c) The project site has no value as habitat for endangered, rare or threatened species.*
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*
- (e) The site can be adequately served by all required utilities and public services.*

“The substantial evidence test [] governs review of an agency’s factual determination [...] A reviewing court does not conduct an independent review of the record. It must affirm an agency’s factual determination that a project fits within an exemption category as long as its determinations are supported by factual evidence.” 1 *Practice Under the California Environmental Quality Act*, § 5.126.D (2d ed. Cal. CEB), citing numerous cases; *see also North Coast Rivers Alliance v. Westlands Water Dist.* (2014) 227 Cal.App.4<sup>th</sup> 832, 852.

The Guidelines define substantial evidence as “enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, ***even though other conclusions might also be reached.***” Guidelines Section 15384(a) [emphasis added]. Thus, under this deferential standard, even if the opposition purports to provide some evidence that supports the opposite conclusion, the City’s CE determination in this case should be upheld based upon the record in this case.

Here, the CPC found that there is substantial evidence in the whole of the record supporting the CE. *See Assessment of 3601 E. Mission Road Project Eligibility for a Categorical Exemption* prepared by LUZ Entitlement Services, LLC, dated October 2022, a copy of which is attached hereto as Exhibit A.

The Appellants challenge the CPC's finding that the Project meets the conditions of a Class 32 CE on the basis that the Project site purportedly has value for endangered, rare or threatened species. First, an Appellant suggests that the Project's proposed removal of five trees Western sycamore (*Platanus racemosa*) trees precludes reliance on the Class 32 CE because the Western sycamore<sup>1</sup> is protected by the City's Protected Tree Ordinance. However, the subject trees do not qualify as protected under the Ordinance because they were planted by the previous owner of the property in or around 2000 pursuant to a landscaping plan. Attached as Exhibit B is an email exchange between Project representatives Albert Vera of the City's Urban Forestry Division dated September 13 through 19, 2022 wherein Mr. Vera confirms that the subject trees do not qualify as protected under the Protected Tree Ordinance. The Project is consistent with the Protected Tree Ordinance, and substantial evidence supports application of the Class 32 CE in this case.

Second, the Appellants provide a list of wildlife observed near the Project site that includes special status species. However, as detailed in the South Environmental *Biologist's Statement of Biological Resources* dated December 29, 2023 and attached as Exhibit C, based upon a site visit of the property on October 31, 2023, the Project site lacks native habitat that special-status species rely on for foraging and nesting. The ruderal and landscaped vegetation occurring on the site does not provide foraging or cover that would be required for these species to persist on the site. Additionally, the Project site contains no source of water. Substantial evidence supports that the site has no value as habitat for special-status species and the Project meets each condition of the Class 32 CE.

### **B. No Exception to the Exemption Applies.**

Having established that the Project qualifies for the Class 32 CE, the burden is on the Appellants to prove that an exception to the exemption applies. The Appellants have failed to meet that burden. Guidelines Section 15300.2 provides a list of six exceptions to categorical exemptions as follows.

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<sup>1</sup> The letter dated September 26, 2023 by Lozeau Drury, LLP on behalf of SAFER identifies a typographical error in the CPC Staff Report, which erroneously identifies the subject trees as "Western Oaks." The Class 32 CE Assessment for Eligibility attached as Exhibit A identifies the subject trees as Western sycamores and the erroneous identification of the trees as "Western Oaks" is a harmless error, especially considering that the "Western Oak" is not an identified species of oak tree.

- a) *Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located--a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

This exception only applies to the listed classes of categorical exceptions, not the Class 32 CE. Regardless, no environmental resource of hazardous or critical concern has been designated, mapped, or officially adopted for the Property.

- b) *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

One of the Appellants makes a vague suggestion that this exception applies to the Project and that cumulative impacts have resulted in displacement of the working class community and homelessness. However, it does not provide any information as to what other projects of the same type in the same place have or will occur that have caused these purported impacts. Moreover, the Project proposes to replace a surface parking lot. No residents will be displaced by the Project. In addition, 73% of the base units of the Project will be set aside for Very Low Income households, resulting in a substantial addition of affordable housing units in the community.

- c) *Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

An Appellant alleges that unusual circumstances exist because the Project will purportedly result in significant impacts from habitat loss. CEQA Guidelines § 15300.2(c), 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.” The plain language of this provision supports the view that, for the exception to apply, it is not alone enough that there is a reasonable possibility the project will have a significant environmental effect; instead, in the words of the Guideline, there must be “a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”

Ignoring this well-established CEQA law, the Appellant fails to make any argument regarding “unusual circumstances” and instead cites to an off-site inspection of the Project area and Lincoln Park, located south of the subject property, conducted by a wildlife biologist to support the possibility that the Project may have a significant effect on the environment. Even if the Appellant met its burden of establishing that unusual circumstances exist, their off-site inspection does not provide substantial evidence of habitat conditions on the Project site. As referenced above, as detailed in the South Environmental Biologist’s *Statement of Biological Resources* dated December 29, 2023 and attached as Exhibit C, based upon a site visit of the property on

October 31, 2023, the Project site lacks native habitat that special-status species rely on for foraging and nesting. The ruderal and landscaped vegetation occurring on the site does not provide foraging or cover that would be required for these species to persist on the site. Additionally, the Project site contains no source of water. No significant impacts from habitat loss will occur.

An Appellant does claims that the “heat island effect” is an unusual circumstance that supports an exception to the Class 32 CE. However, this claim is not substantiated by any evidence, much less substantial evidence. For example, Appellants include a lengthy argument regarding the environmental benefits of trees. While the Project does propose the removal of 43 non-protected trees, the Project proposes the retention of all 11 of the existing parkway trees and the addition of 24 Olive trees, 7 Catalina Cherry trees, 13 Japanese maple trees, and 4 western sycamore trees. As such, the Project will result in a total of 59 trees where 54 trees currently exist. See Gentry v. City of Murrieta (1995) 36 Cal.App.4<sup>th</sup> 1359, 1417 [“[I]n the absence of a specific factual foundation in the record, dire predictions by nonexperts regarding the consequences of a project do not constitute substantial evidence.”]; Perley v. County of Calaveras (1982) 137 Cal.App.3d 424, 436-437 [unsubstantiated fears and desires of project opponents do not constitute substantial evidence].

“Allowing project opponents to negate [exemption] determinations based on nothing more than ‘a fair argument that the project will have significant environmental effects’ ... would be fundamentally inconsistent with the Legislature’s intent in establishing the categorical exemptions.” Berkeley Hillside Pres. v. City of Berkeley (2015) 60 Cal. 4th 1086, 1106. Appellants have failed to meet their burden of establishing that the Project will have a significant effect on the environment due to unusual circumstances.

*d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

Neither Mission Road nor Lincoln Park Avenue are designated state scenic highways. Thus, this exception does not apply to the Project. Moreover, there are no historic buildings on the Property, and no rock outcroppings or similar resources exist at the Property. While the Project will result in the removal of trees, as noted above those trees are not protected by the Los Angeles Protected Tree Ordinance.

- e) *Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The Property is not listed as a hazardous waste site. While one of the Appeals suggests that this exception should apply because an adjacent property was subject to remediation due to soil contamination, Appellants have provided evidence that soil or groundwater contamination migrated to the Project site prior to the remediation. The letter attached as Exhibit D from Earth Science, LLC dated November 6, 2023 concludes that there is no pathway for soil or groundwater contamination from the nearby properties to impact the Project site.

- f) *Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The Project site is currently vacant and therefore does not contain any historical buildings nor does it meet the criteria for eligibility for listing on any federal, state, or local register of historic resources. One Appeal suggests that the Project will have adverse impacts on the Lincoln Park, Plaza de la Raza, and Wall las Memorias historical resources. However, the claim that the Project would obstruct sunlight or affect the native birds and trees at Lincoln Park is not substantiated by any evidence, much less substantial evidence. See Gentry v. City of Murrieta (1995) 36 Cal.App.4<sup>th</sup> 1359, 1417 [“[I]n the absence of a specific factual foundation in the record, dire predictions by nonexperts regarding the consequences of a project do not constitute substantial evidence.”]; Perley v. County of Calaveras (1982) 137 Cal.App.3d 424, 436-437 [unsubstantiated fears and desires of project opponents do not constitute substantial evidence].

The Appellants have failed to meet their burden of establishing that an exception to the Class 32 CE applies and the CPC determination must be upheld. See Berkeley Hillside Preservation v. City of Berkeley (2015) 60 Cal.4<sup>th</sup> 1086, 1105 [a party challenging the exemption has the burden of producing evidence supporting an exception].

#### **IV. Conclusion.**

For the reasons provided herein and any such additional reasons and evidence presented at the hearing, we respectfully request that the appeal be denied in its entirety and the decision of the CPC upheld. Appellants have provided no substantial evidence to support their arguments that the Class 32 CE does not apply.

City of Los Angeles  
PLUM Committee  
August 2, 2024  
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Thank you for your time and consideration of this matter. As always, please do not hesitate to contact me at any time with any questions or comments that you may have.

Sincerely,

GAINES & STACEY LLP

*Alicia B. Bartley*

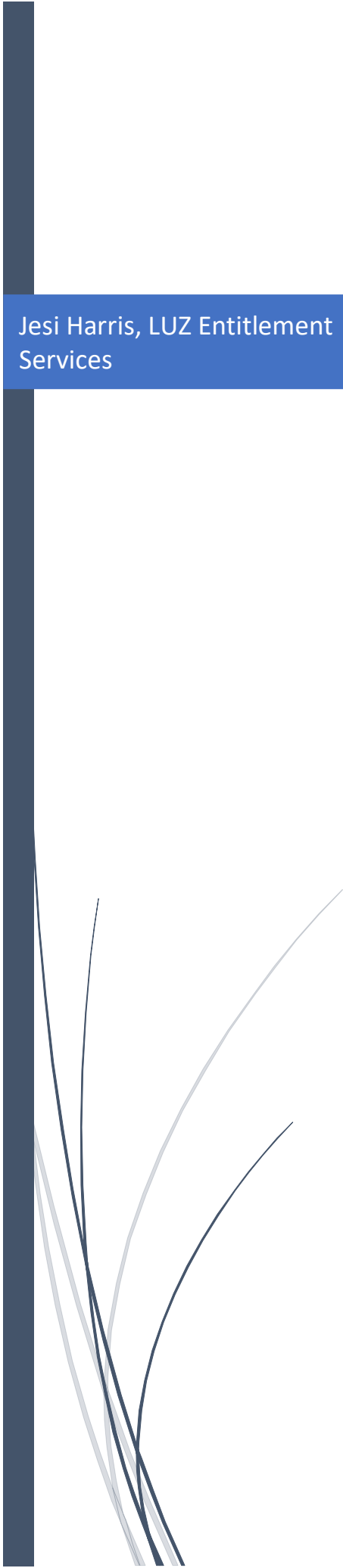
By

Alicia B. Bartley

cc: Kathryn Phelan (Via Email: [Kathryn.Phelan@lacity.org](mailto:Kathryn.Phelan@lacity.org))  
Trevor Martin (Via Email: [Trevor.Martin@lacity.org](mailto:Trevor.Martin@lacity.org))  
Heather Bleemers (Via Email: [Heather.Bleemers@lacity.org](mailto:Heather.Bleemers@lacity.org))

# Exhibit A





Jesi Harris, LUZ Entitlement  
Services

# Mission and Lincoln Apartment Project

Class 32 Categorical Exemption

**Mission and Lincoln Apartment Project  
2036 Lincoln Park Avenue, Los Angeles, CA 90031  
CLASS 32 CATEGORICAL EXEMPTION  
ENVIRONMENTAL CHECKLIST**

PREPARED FOR: The City of Los Angeles Planning Department  
201 N. Figueroa St, CA 90012

APPLICANT: Lincoln Park Holdings, LLC

PREPARED BY: LUZ Entitlement Services, LLC  
1008 N. Stanley Ave, Los Angeles, CA 90046

**October 2022**

**Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a  
Class 32 In-Fill Development**

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Appendix B: VMT Calculator

Appendix C: CalEEMod Output Sheets

Appendix D: EnviroStor and GeoTracker Project Site Results

**City of Los Angeles**  
**Class 32 Categorical Exemption**  
**Infill Development Projects**

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**Mission and Lincoln Apartments**

**Actions Requested:** Density Bonus (LAMC 12.22. A.25. and 12.24. U.26.)  
Site Plan Review (LAMC 16.05)

**Project Location:**

3601 - 3615 E. Mission Rd, Los Angeles, CA 90031  
2010 - 2036 N. Lincoln Park Ave, Los Angeles, CA 90031  
3609 E. Mission Rd, Los Angeles, CA 90031  
3615 E. Mission Rd, Los Angeles, CA 90031  
2016 N. Lincoln Park Ave, Los Angeles, CA 90031  
2020 N. Lincoln Park Ave, Los Angeles, CA 90031  
2026 N. Lincoln Park Ave, Los Angeles, CA 90031  
2030 N. Lincoln Park Ave, Los Angeles, CA 90031  
2036 N. Lincoln Park Ave, Los Angeles, CA 90031

**Project Applicant:**

Name: Shay Yadin  
Company: Lincoln Park Holdings, LLC  
Address: 100 S. Citrus Ave, Los Angeles, CA 90036  
Email: sy@brennercapital.com  
Phone: 917-285-3438

**General Plan Designation:** Medium Residential

**Zoning:** R3-1 Zone

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

### **California Environmental Quality Act Class 32 Categorical Exemption Evaluation**

This assessment evaluates whether the proposed project located in the City of Los Angeles (City) at 3601 E Mission Road, 3609 E Mission Road, 3615 E Mission Road, 2016 N Lincoln, 2020 N Lincoln, 2026 N Lincoln, 2030 N Lincoln, and 2036 N Lincoln (henceforth referred to as “the project at 3601 Mission Road”) qualifies for a Class 32 Categorical Exemption under the California Environmental Quality Act (CEQA) as an eligible infill development.

CEQA defines categorical exemptions for various types of projects the Secretary of the Resources Agency of the State of California has determined would not have a significant effect on the environment and, therefore, are not subject to further environmental review under CEQA. The Class 32 exemption (Section 15332 of the State CEQA Guidelines) is intended to promote infill development within urbanized areas. The class consists of environmentally benign infill projects consistent with local general plan and zoning requirements.

Pursuant to Section 15332 of the State CEQA Guidelines, for a project to be eligible for a Categorical Exemption as Class 32 In-fill Development, a project must meet the following conditions, or criteria:

#### ***Criteria***

- (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 (5) acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

In addition, projects seeking this Categorical Exemption cannot fall under certain specified exceptions, as follows.

#### ***Exceptions***

- (a) The project and successive projects of the same type in the same place will result in cumulative impacts.
- (b) There are unusual circumstances creating the reasonable possibility of significant effects.

## Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development

- (c) The project may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within an officially designated scenic highway.
- (d) The project is located on a site that the Department of Toxic Substances Control and the Secretary of the Environmental Protection have identified, pursuant to Government code section 65962.5, as being affected by hazardous wastes or clean-up problems.
- (e) The project may cause a substantial adverse change in the significance of an historical resource.

The justification for use of a Class 32 Categorical Exemption as an infill project in compliance with CEQA and the City's Class 32 Requirements is provided below in the following format: I. Project Description, II. Evaluation of Class 32 Exemption Criteria, III. Consideration of Exemptions, and IV. Conclusion.

### I. PROJECT DESCRIPTION

The subject property consists of one (1) whole existing parcel containing eight (8) lots totaling 50,656.5 square feet of lot area. The parcel is currently developed with a 42-stall automobile parking lot which serves the adjacent parcel, currently developed with a residential care facility. Project plans include replacing the surface parking lot on the subject site with a seven-story, 184-unit apartment building and two levels of at- and above-grade parking facilities containing a total of 145 parking spaces, 103 of which are devoted to the on-site residential uses and 42 of which are dedicated to the adjacent medical facility use. The project site does not include the parcel to the east currently developed with a residential care facility. The project site is surrounded by urban development, consisting of multi-family residential and commercial land uses.

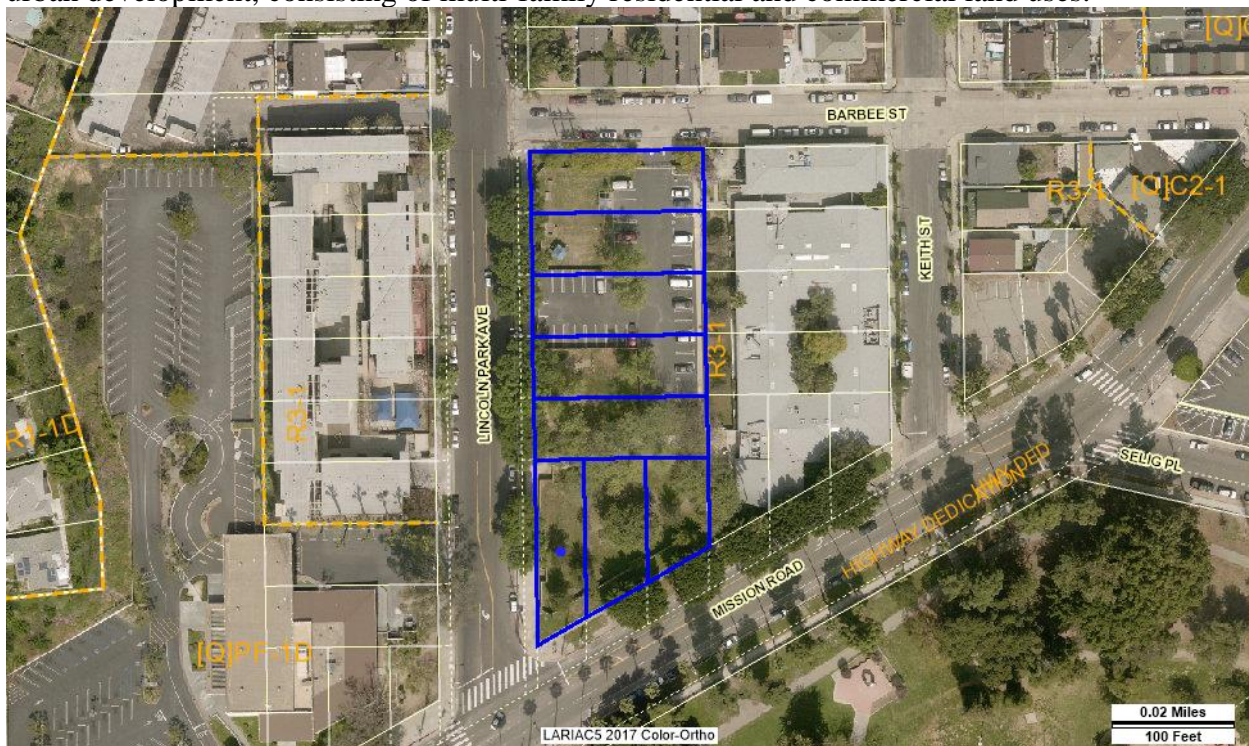


Figure 1 shows the proposed project site. The board and care facility in the adjacent lot is not part of the proposed project.

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

### **II. EVALUATION OF CLASS 32 EXEMPTION CRITERIA**

The following subsections provide discussion and analysis of the project's consistency with the criteria listed in Section 15332 of the State CEQA Guidelines, for a project to be eligible for a Categorical Exemption as a Class 32 In-fill Development project.

#### **Written justification that the proposed Project meets the following criteria:**

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

The proposed residential project is consistent with the subject property's existing General Plan designation, as specified in the Northeast Los Angeles Community Plan, a component of the City's General Plan, which designates the site for "Medium Residential." The site zoning is R3-1. The project would therefore not require a General Plan Amendment or Zoning Change. Multiple dwelling units are consistent with R3 uses as outlined in the Los Angeles Municipal Code (LAMC) Section 12.10. Under the existing zoning of R3-1, the minimum lot area per dwelling unit is 800 sf. Therefore, the 50,656.5 square foot lot would allow sixty-four (64) units on the project site. The project is providing a 73 percent affordable housing set-aside for Very Low Income households, which would allow for an additional one hundred and twenty-two (122) units per the LAMC 12.21 A 25 and LAMC 12.24 U 26 for a combined total of 186 allowable units. The project is, therefore, within the parameters of the density allowed for projects in the R3 zone with its rate and depth of affordability.

Additionally, the project's on- and off-menu incentives and waivers of development standards allow for a 21 percent increase in floor area ratio, a 41-foot height increase, parking and open space design adjustments, and yard reductions, therefore, the project's requests for increases in the building envelope are consistent with the project's intended zoning regulations based upon what's allowable in the R3 zone for Density Bonus projects. The construction of a 184-unit apartment building would be consistent with the General Plan designation and zoning.

Therefore, the project would be consistent with all applicable general plan designation, general plan policies and applicable zoning designation and regulations.

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

The project site is located within the city limits of the City of Los Angeles. The project site consists of approximately 50,656.5 square feet of land, or 1.16 acres, and is surrounded by existing urban uses, including single- and multi-family residential uses to the north, multi-family and public facility uses to the west, a commercial medical use to the east and a public park of approximately 41 acres to the south. Therefore, the project is consistent with this condition.

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

The project site is located within a highly urbanized portion of the City of Los Angeles. The surrounding urban landscape including the project site has been developed for decades. The

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

project site is currently developed with a surface parking lot and hardscape landscaping. The subject property does not have reported occurrences of special-status species in the California Natural Diversity Database (CNDDB) maintained by the California Department of Fish and Wildlife (CDFW). The project site does not include riparian areas or other sensitive plant communities. According to the United States Fish and Wildlife Service Information for Planning and Consultation Tool, the project site does not contain critical habitats for any endangered, rare, or threatened species.

The project site does contain a number of pre-existing trees including five (5) Western sycamore (*Platanus racemosa*) trees, however, they are not considered protected tree species by Los Angeles Tree Protection Ordinance since they were planted by the property's previous owner as part of a planting program (see Protected Tree Report, Appendix A). Western sycamore trees are not included on the California Natural Diversity Database of endangered, rare, or threatened tree species. The database lists plant taxa that have been officially classified as Endangered, Threatened, or Rare by the California Fish & Game Commission (FGC; state listed) or by the U.S. Secretary of the Interior or the U.S. Secretary of Commerce (federally listed). This list also includes taxa that are official candidates for state or federal listing, or have been officially proposed for federal listing, as well as taxa that were once listed but have since been delisted.

Therefore, the project site has no substantive value as a 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.**

### **Transportation Effects**

The project would have a significant impact if the project would conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)(1), relating to Vehicle Miles Traveled (VMT). CEQA Guidelines Section 15064.3(b)(1) applies to land use projects and states, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact." Both of the following City of Los Angeles Transportation Assessment Guidelines (TAG) screening criteria must be met in order to require further analysis of a land use project's VMT contribution: the land use project would both generate a net increase of 250 or more daily vehicle trips and the project would generate a net increase in daily VMT.

In order to determine if both criteria are triggered by the project, a basic run of the City of Los Angeles VMT Calculator was performed (see Appendix B). The VMT Calculator run determined that the project's one hundred eighty-four (184) new multi-family residences would generate 734 average daily trips (ADT), and 5,281 daily VMT. The proposed project would remove and replace the existing forty-two (42) commercial parking spaces, which currently do not generate any ADT or daily VMT. As such, the VMT generated by the project warrants further analysis of the project's VMT contribution.



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The project will implement several mitigation measures to minimize its transportation impacts including reduced on-site parking supply, unbundled parking, and infrastructure to encourage the use of less impactful, alternative modes.

The project's unit mix consists of 87 studio units, 67 one-bedroom units, 26 two-bedroom units, and four three-bedroom units. Based on the regulations contained in LAMC 12.21 A.4., the project is required to provide 248 automobile parking spaces. LAMC 12.21 A.4. also allows residential projects that contain at least the minimum number of restricted affordable units to receive a density bonus under Section 12.22 A.25. may replace up to 30 percent of the required automobile parking with bicycle parking at a ratio of one standard or compact automobile parking space for every four bicycle parking spaces provided. The project plans to provide 129 bicycle parking spaces – 117 long term spaces and 12 short term spaces. Therefore, the project is permitted to replace 32 required automobile parking spaces with bicycle parking spaces resulting in an automobile parking requirement of 216 spaces.

Through the requests permitted by its density bonus and pursuant to LAMC 12.22 A.25, the project is proposing 103 residential automobile parking spaces, a reduction of 112 spaces. Reducing the project's parking supply reduces the project's anticipated transportation impacts.

In addition to providing ample bicycle parking and reducing the parking supply, the project will also implement unbundled parking as a method of distributing the available residential automobile parking. Unbundled parking is the practice of selling or leasing parking spaces separate from the purchase or lease of the commercial or residential use. The unbundled parking spaces will only be available to the building's residents. This method is projected to further reduce the project's transportation impacts.

The Transportation Assessment prepared by KOA, a transportation engineering and mobility planning firm, reports in detail how the project's transportation impacts will be less than significant despite daily VMT and ADT impacts.

### **Air Quality Effects**

Based upon criteria established by the LA City Planning Department and the South Coast Air Quality Management District for screening the air quality impacts of new projects, if the proposed project has less than 80 residential units or less than 75,000 square feet of non-residential use and involves less than 20,000 cubic yards of soil export, it will not likely exceed the SCAQMD construction or operational thresholds, and therefore will not require an Air Quality Assessment.

The proposed project includes 184 new residential units. It does not include any floor area devoted to non-residential uses and will involve approximately 5,550 cubic yards of soil export. Based on the number of residential units proposed, the project's construction air quality effects are further evaluated below.

### **Regulatory Setting**

SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SCAB). SCAB includes portions of Los Angeles, Riverside, and San

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Bernardino counties and all of Orange County. Specifically, the SCAQMD is responsible for monitoring air quality and planning, implementing, and enforcing programs designed to attain and maintain State and Federal ambient air quality standards in the SCAQMD.

The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table I, SCAQMD Air Quality Significance Thresholds. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

<b>Mass Daily Thresholds</b>		
<b>Pollutant</b>	<b>Construction</b>	<b>Operation</b>
NO <sub>x</sub>	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM <sub>10</sub>	150 lbs/day	150 lbs/day
PM <sub>2.5</sub>	55 lbs/day	55 lbs/day
SO <sub>x</sub>	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Table I – SCAQMD Daily Mass Significance Thresholds		

### **Evaluation of Project Significance**

The analysis estimated emissions using the CalEEMod (Version 2020.4.0) software, 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 emissions from a variety of land use projects. The SCAQMD developed CalEEMod in collaboration with the air districts of California.<sup>28</sup> Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) from the various California air districts accounts for local requirements and conditions. The model is an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and recommended for use in CEQA documents by the SCAQMD.

The analysis forecasts daily regional emissions during construction by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The analysis adjusts the input values used to be project-specific for the construction schedule and, uses CalEEMod defaults for the construction equipment that the Project would use. The CalEEMod program uses the EMFAC2017 computer program to calculate the emission rates specific for Los Angeles County for construction-related employee vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy truck operations. EMFAC2017 and OFFROAD2011 are computer programs generated by California Air Resources Board (CARB) that calculates composite emission rates for vehicles. The program reports emission rates in either grams per trip and grams per mile, or grams per running hour. The analysis uses daily truck trips and CalEEMod default trip length data to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not

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represent the emissions that would occur for every day of project construction. The analysis then compares maximum daily emissions to the SCAQMD daily regional numeric indicators. The table below summarizes the estimated emissions from the proposed project using the assumptions that construction will begin in July 2023 and continue for 236 cumulative days, not including non-active days such as weekends and holidays. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in Appendix C of this document.

Maximum Mass Daily Emissions for Proposed Project				
Pollutant	Construction	Exceeds Threshold?	Operation	Exceeds Threshold?
NO <sub>x</sub>	4.28 lbs/day	No	3.90 lbs/day	No
VOC	4.24 lbs/day	No	11.04 lbs/day	No
PM <sub>10</sub>	0.74 lbs/day	No	7.80 lbs/day	No
PM <sub>2.5</sub>	0.35 lbs/day	No	2.89 lbs/day	No
SO <sub>x</sub>	.01 lbs/day	No	.081 lbs/day	No
CO	5.48 lbs/day	No	44.71 lbs/day	No
Table II – Project Daily Mass Emissions				

### Noise Effects

Noise is typically defined as a sound that is loud, unpleasant, unexpected, or otherwise undesirable and is described in terms of a sound's amplitude (loudness), frequency (pitch), or duration (time). The ambient noise environment is comprised of stationary and mobile noise sources. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as "spreading loss." For a single point source, sound levels decrease by approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by onsite operations from stationary equipment or activity at a project site.

Everyday sounds normally range from 30 dB (very quiet) to 100 dB (very loud). The A-weighted decibel scale relates noise to human sensitivity. The "A-weighted decibel", abbreviated dBA, is the measurement used for common noise levels. Table III, Typical Noise Levels, provides examples of various noises and their typical A-weighted noise level.

Table XXX: Typical Noise Levels		
Common Outdoor Noise Source	Noise Level (dBA)	Common Indoor Noise Source
Thunder	110	Rock Band
Jet Fly-Over at 100 Feet	105	

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Chainsaw	100	Large Cocktail Party
Gas Lawnmower at 3 Feet	95	
Subway at 20 feet	90	Hand Dryer
	85	Food Blender at 3 Feet
Diesel Truck Traveling at 50 MPH at 50 Feet	80	Garbage Disposal at 3 Feet
	75	
Gas Lawnmower at 100 Feet	70	Vacuum Cleaner at 10 Feet
	65	Normal Speech at 3 Feet
Heavy Traffic at 300 Feet	60	Air conditioner, window unit
	55	
Crickets	50	Dishwasher in Next Room
	45	
Light Rainfall	40	Quiet Office
Ambient Wilderness Sounds	35	Quiet Residence
Leaf Falling	30	Whisper
	25	
	20	
	15	Low Whisper
	10	Normal Breathing
	5	
	0	

Table III- Typical Noise Levels

Source: *Noise Navigator™ Sound Level Database*. Univ. of Michigan, Dept. of Environmental Health Science, Ann Arbor, MI

Although human perception of sound is somewhat subjective, it is widely accepted that the average healthy ear (1) can barely perceive an increase or decrease of 3 dBA; (2) can perceive a change of 3 dBA in outdoor environments; and (3) can notice that an increase of 10 dBA sounds twice as loud.

Noise, or sound over a period of time, can be measured using a number of methods. The two most common methods are the community noise equivalent (CNEL) and the equivalent sound level (Leq). dBA Leq is the term for measurement of the average noise levels over a period of minutes or hours. The CNEL scale represents the average of 24-hourly noise measurements and adjusts or penalizes the dBA during certain sensitive time periods to account for increased noise sensitivity during the evening and nighttime periods. The evening time period (7:00 PM to 10:00 PM) penalizes noises by 5 dBA, while nighttime (10:00 PM to 7:00 AM) noises are penalized by 10 dBA.

### Regulatory Setting

#### State of California

Title 24 of the California Code of Regulations, also known as the California Building Standards Code, establishes building standards applicable to all occupancies throughout the state. Section 1207.11.2 requires that the design of residential structures, other than detached single-family dwellings, prevent the intrusion of exterior noise so that the interior noise attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room. Section 1207.12 states, “if

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interior allowable noise levels are met by requiring that windows be inoperable or closed, the design for the structure must also specify a ventilation or air-conditioning system to provide a habitable interior requirement. The ventilation system must not compromise the dwelling unit or guest room noise reduction.”

### **City of Los Angeles**

On February 3, 1999, the City Council of the City of Los Angeles adopted its Noise Element as a component of the City’s General Plan. The Noise Element applies to the city as a whole and addresses noise mitigation regulations, strategies, and programs by setting forth noise management goals, objectives, and policies.

The city’s comprehensive noise ordinance (LAMC Section 111 et seq.) establishes sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses (radios, television sets, vehicle repairs and amplified equipment, etc.), hours of operation for certain uses (construction activity, rubbish collection, etc.), standards for determining noise deemed a disturbance of the peace, and legal remedies for violations. Its ambient noise standards are consistent with current state and federal noise standards. They are correlated with land use zoning classifications in order to guide the measurement of intrusive noise that results in intermittent (periodic) or extended impacts on a geographically specific site. The intent is to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within the zones specified. The standards guide building construction and equipment installation, equipment maintenance and nuisance noise enforcement.

The most basic noise management measure is traditional zoning that separates agricultural, residential, commercial and industrial uses. Another is the front yard set back that serves to distance homes from adjacent street noise. Side and rear yards also serve as noise buffers. Through zone change and subdivision processes, site or use specific conditions can be imposed to assure compatibility of land use and to protect users of a site from impacts from adjacent uses.

The city’s building code guides building construction. The insulation provisions are intended to mitigate interior noise from outside sources, as well as sound between structural units. The provisions vary according to the intended use of the building, e.g., residential, commercial, industrial. The regulations are intended to achieve a maximum interior sound level equal to or less than the ambient noise level standard for a particular zone, as set forth in the city’s noise ordinance. In addition, LAMC Section 91.1206.14.2 regulates the performance standards of building materials in regard to acceptable interior noise levels, declaring that buildings shall be designed such that interior noise levels attributable to exterior sources shall not exceed 45 db in any habitable room. The noise metric shall be either the day-night average sound level (Ldn) or the community noise equivalent level (CNEL), consistent with the noise element of the local general plan.

LAMC Section 112.05 pertains to the maximum noise levels of powered equipment and powered hand tools. Specifically, it reads:

Between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment

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or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75dB(A) for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75dB(A) for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65dB(A) for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors;

The noise limits for particular equipment listed above in (a), (b) and (c) shall be deemed to be superseded and replaced by noise limits for such equipment from and after their establishment by final regulations adopted by the Federal Environmental Protection Agency and published in the Federal Register.

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

In addition to the above, LAMC Section 41.40. details when construction and excavation activities are prohibited, containing the provisions below:

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

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



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in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specified.

LAMC Section 112.02 pertains to permissible noise levels of air conditioning, refrigeration, heating, pumping, and filtering equipment, containing the provisions below:

It shall be unlawful for any person, within any zone of the city to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than five (5) decibels.

### **Existing Conditions**

The City's Noise Element defines the following land uses as noise-sensitive receptors: single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks.

A residential neighborhood with single- and multi-family uses sits just north of the project site, just across Barbee Street. Other sensitive land uses that may be affected by project noise include: Amistad Preschool directly west of the site (across Lincoln Park Avenue), the 41-acre Lincoln Park just south of the project site (across Mission Road), and a 78-bed board and care facility on the parcel adjacent to the project site to the east (the facility will be vacant during the project construction period).

To identify existing noise conditions, four short-term (10-minute) noise levels were measured in the vicinity of the project site. Figure 2, Noise Measurement Location Map depicts the locations of the noise measurements. The project team consultant conducted the noise survey on August 5, 2022, between 2:03 PM and 4:08 PM. The consultant calibrated and operated the sound measurement instrument according to the manufacturer's written specifications. At the measurement sites, the consultant placed the microphone at a height of approximately five feet above grade. As shown on Figure 2, Noise Measurement Location Map, the Consultant took the noise measurements near the closest noise-sensitive land uses: to the north, north of Barbee Street (NM1); to the east, adjacent to the eastern boundary of the project site (NM2); to the west, west of Lincoln Park Avenue (NM3); and to the south, in a central location of Lincoln Park (NM4). Table IV, Existing Ambient Noise Levels, provides a summary of the ambient noise data. Ambient average noise levels ( $L_{eq}$ ) were between 54.2 and 62.6 dBA  $L_{eq}$ . The dominant noise sources were from vehicles traveling along the adjacent roadways and parking area, car doors closing, residential ambiance (music playing, conversation, etc.), the freight train that runs along Valley Boulevard, ambulances, and helicopters and other aircraft. The freight train was observed to run approximately once every hour and a half for about eight (8) minutes. From 4:00 PM until 4:08 PM, the train emitted sounds from its bells, whistles, and physical movement mechanisms that reached an  $L_{max}$  of 83.9 from a distance of 700 feet.

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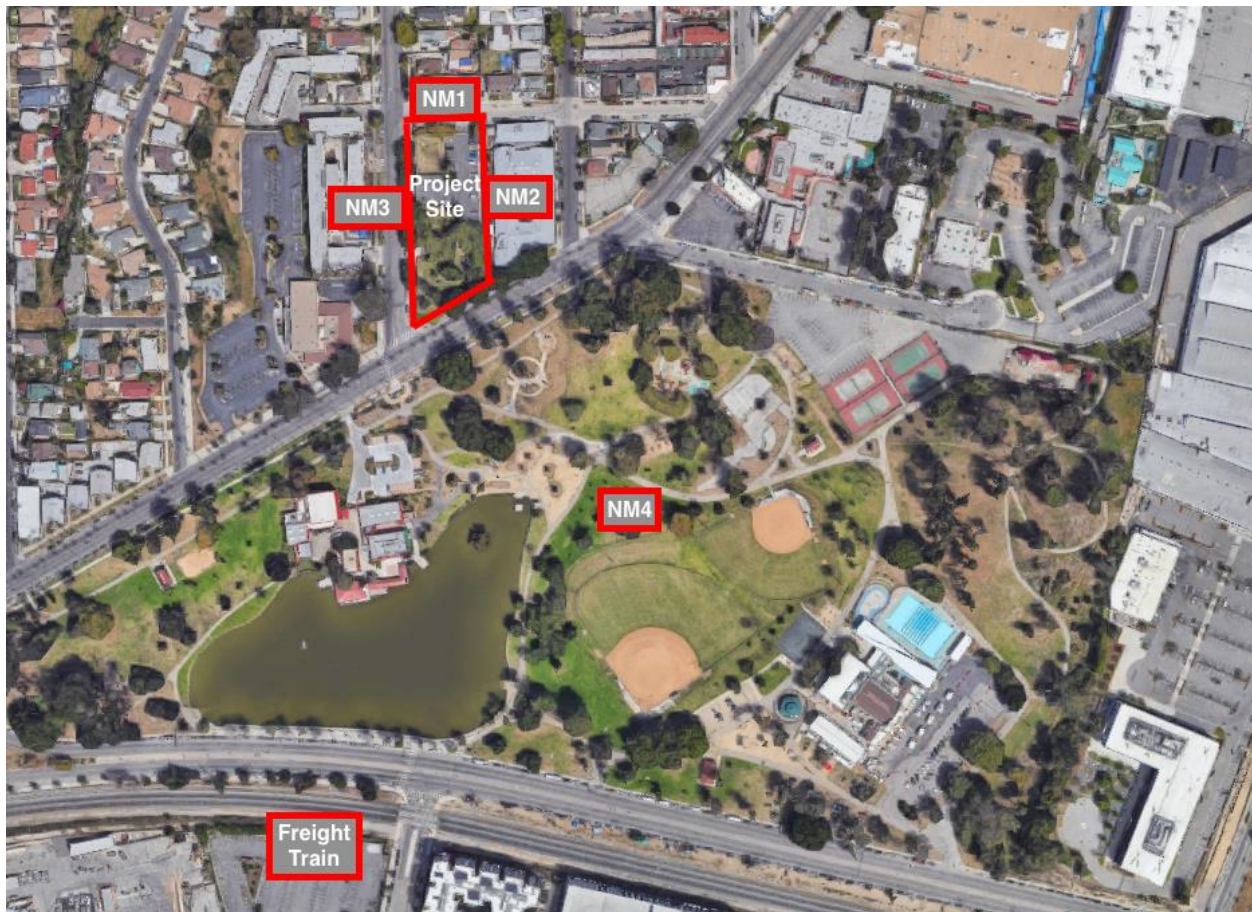


Figure 2 – Noise Measurement Locations

NOISE MEASUREMENT LOCATION	LOCATION	PRIMARY NOISE SOURCES	LeQ	LMAX	LMIN
NM1	Single- and multi-family residential uses	<ul style="list-style-type: none"> <li>Barbee Street and Lincoln Park Ave traffic</li> <li>Residential ambience (music)</li> </ul>	55.5	72.6	42.8
NM2	Board and care facility	<ul style="list-style-type: none"> <li>Mission Road traffic</li> <li>Vehicles in adjacent parking lot</li> <li>Ambient conversation</li> <li>Valley Blvd freight train</li> </ul>	62.6	81.3	43.9
NM3	Amistad Pre-school	<ul style="list-style-type: none"> <li>Lincoln Park Ave traffic</li> <li>Ambient conversation</li> <li>Valley Blvd freight train</li> </ul>	57	74.1	48.1
NM4	Lincoln Park	<ul style="list-style-type: none"> <li>Mission Road traffic</li> <li>Ambient conversation</li> </ul>	54.2	77.0	41.3



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		<ul style="list-style-type: none"> <li>• Valley Blvd traffic and freight train</li> <li>• Skateboards and other park facility users</li> <li>• Helicopters and other aircraft</li> </ul>			
<b>TABLE IV - EXISTING AMBIENT NOISE LEVELS</b>					

**Project Noise Impacts**

**Construction Noise Impacts**

The Applicant expects construction of the Project to last approximately 18 months and require the use of heavy equipment. The Applicant anticipates that the construction phases for the Project would include demolition, site preparation, grading, building construction, paving, and architectural coating. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity.

Construction activities and associated noise would be temporary and be restricted to daytime hours pursuant to Los Angeles Municipal Code (LAMC) Section 41.40. The maximum noise level of construction equipment is regulated by LAMC Section 112.05 to 75 dB at 50 feet from the source; however, the LAMC indicates such restrictions do not apply where technically infeasible despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment. The table below is based on the  $L_{max}$  noise levels of construction equipment provided in the Federal Highway Administration Construction Noise Handbook, Construction Noise Levels – Regulatory Compliance which provides construction equipment noise levels with the use of mufflers and sound barriers required by LAMC Section 112.05. The number of each equipment type needed for the construction of the proposed project is indicated in the third column of the table.

<b>Phase</b>	<b>Equipment</b>	<b>#</b>	<b>Type</b>	<b><math>L_{max}</math> at 50 ft (dBA)</b>	<b>LAMC Sec. 112.05 Compliance</b>	<b>Reduced <math>L_{max}</math> at 50 ft (dBA)</b>
Demolition	Concrete Industrial Saws	1	Stationary	90	Barrier	70
	Rubber Tired Dozers	1	Mobile	82	Muffler	67
	Tractors/Loaders/Backhoes	3	Mobile	80	Muffler	65
Site Preparation	Graders	1	Mobile	85	Muffler	75
	Rubber Tired Dozers	1	Mobile	82	Muffler	67
	Tractors/Loaders/Backhoes	1	Mobile	80	Muffler	65
Grading	Graders	1	Mobile	85	Muffler	75
	Rubber Tired Dozers	1	Mobile	82	Muffler	67
	Tractors/Loaders/Backhoes	2	Mobile	78	Muffler	65

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Building Construction	Cranes	1	Mobile	81	Muffler	66
	Forklifts	1	Mobile	75	None	75
	Generator Sets	1	Stationary	81	Muffler	66
	Tractors/Loaders/Backhoes	1	Mobile	80	Muffler	65
	Welders	3	Stationary	74	None	74
Paving	Cement and Mortar Mixers	1	Mobile	79	Muffler	64
	Pavers	1	Mobile	77	Muffler	62
	Paving Equipment	1	Mobile	77	Muffler	62
	Rollers	1	Mobile	80	Muffler	65
	Tractors/Loaders/Backhoes	1	Mobile	78	Muffler	65
Architectural Coating	Air Compressors	1	Stationary	78	Barrier	58
Table V - Construction Noise Levels						

As shown in the final column of Table V, regulatory compliance with LAMC Section 112.05 standards, requiring mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment would reduce the construction noise levels to less than 75 dBA at 50 feet through industrial-grade mufflers on mobile equipment and barriers or enclosures formed by sound transmission obscuring products around stationary equipment. Mufflers and sound transmission obscuring products, like barriers or enclosures, are available from a variety of manufacturers. Therefore, construction related temporary noise level increases would be less than significant with regulatory compliance measures incorporated.

### **Operational Noise Impacts**

Pursuant to LAMC Section 112.02, the project would be considered to exceed operational noise ordinance standards if it would increase the ambient noise level on another property by more than 5 dBA.

This project does not propose to develop commercial, industrial, manufacturing, or institutional facilities that are associated with loud stationary noise sources. The project would introduce new stationary noise sources in the form of Heating, Ventilation, and Air Conditioning (HVAC) units. It is assumed that the project would include 200 rooftop HVAC units, one unit to maintain the temperature of each of its one hundred eighty-four (184) dwelling units, lobby, leasing office, business center, meeting room, the elevator lobby, fitness center, clubhouse, mezzanine, and all seven (7) of its corridors. Based on noise levels for HVAC units similar to those expected to be used in the project, each HVAC unit would produce a noise level of 66 dBA Leq at 3.3 ft.

This analysis assumes all 200 roof-mounted HVAC units are in simultaneous use as a “worst-case” scenario although actual HVAC use would depend on weather conditions and tenant occupancy. Addition of the reference noise levels for the 200 HVAC units would result in a composite reference noise level of 89 dBA at 3.3 feet, a value that is used to calculate noise

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levels at greater distances. Of the nearby sensitive land uses, the property which would experience the greatest level of noise from HVAC operation would be the board and care facility on the adjacent parcel to the east at 2010 Lincoln Park Avenue, approximately 75 feet of horizontal distance and 30 feet of vertical distance from the nearest portion of the project rooftop area in which HVAC units could potentially be placed. At this distance, a diagonal distance of approximately 81 feet, the sound pressure levels would be reduced by about 27.8 dBA to 61.2 dBA based on the equation for distance attenuation of a point source. In addition, the parapet and roofline would decrease noise levels by a further 10 dBA based on the Federal Transit Administration (FTA) methodology for calculating barrier insertion loss for a final noise level of 51.2 dBA.

Based on the Noise Measurement samples collected by the consultant, pre-existing ambient noise levels from just outside of the board and care facility reach an  $L_{MAX}$  of 81.3 and have an  $L_{EQ}$  of 62.6. Based on the formula for the addition of decibels, the addition of 51.2 dBA from the 200 proposed HVAC units to the ambient daytime noise level would result in an increase of 0.3 dBA above the presumed daytime ambient noise level of 62.6 dBA. All other property boundaries would experience lower levels of HVAC noise. Therefore, operational HVAC noise would not exceed the ambient noise level by more than 5 dBA in compliance with LAMC Section 112.02. In addition, noise levels would be further reduced by building materials used at the receptor site, as mandated by LAMC Section 91.1206.14.2. Table VI below shows the project's presumed operational impacts to the nearest sensitive receptor sites.

Noise Measurement Location <sup>1</sup>	Location	Existing $L_{EQ}$ <sup>2</sup>	Distance from HVAC Units	Projected Noise Level Increase <sup>4</sup>
NM1	Single- and multi-family residential uses	55.5 dBA	114 feet	4.6 dBA
NM2	Board and care facility	62.6 dBA	81 feet	0.3 dBA
NM3	Amistad Pre-school	57 dBA	130 feet	1.8 dBA
NM4	Lincoln Park	54.2 dBA	760 feet <sup>3</sup>	.02 dBA
Table VI – Operational Noise Level Impacts Notes: 1. Figure 2 – Noise Measurement Location Map; 2. Based on samples collected by Consultant August 5, 2022, between 2:03PM and 4:08PM.; 3. Central park location chosen to model existing and projected impacts to park users based on distribution of park infrastructure and users at time of sampling. 4. Based on projected resulting noise levels from adding operational use of HVAC units to the existing ambient noise levels.				

Furthermore, according to Chapter 2 (page 2-5) of the City of Los Angeles Noise Element: “It has been estimated that standard insulation, efficiently sealing windows and other energy conservation measures reduce exterior-to-interior noise by approximately 15 decibels. Such a reduction generally is adequate to reduce interior noise from outside sources, including street noise, to an acceptable level. Building setbacks and orientation also reduce noise impacts.” As such, the resultant noise impacts from the operational use of the proposed project's rooftop XX HVAC units on the indoor sensitive uses, namely the board and care facility, daycare, and single- and multi-family homes, will be reduced by the receptor site's use of appropriate building materials.

### Project-Specific Traffic Noise Impacts

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

Generally, it takes a doubling of traffic volumes to increase traffic noise levels by 3 dBA, which is the level at which changes are barely perceptible to the human ear. The major sources of traffic noise in the project vicinity are Mission Road and Lincoln Park Avenue. Based on City of Los Angeles VMT Calculator, the project would generate a net increase of 734 ADT. A traffic volume increase of 734 ADT on either Mission Road or Lincoln Park Avenue would far less than double traffic volumes and would therefore result in a noise level increase far below 3 dBA. As such, the additional traffic generated by the project would not be expected to result in a significant noise impact.

### **Water Quality Effects**

The proposed infill development would introduce new residential land uses to a parcel currently developed with surface parking facilities. Existing utility lines would provide water supplies and wastewater treatment services. The project would be served by existing sewer line infrastructure including vertical laterals which connect to existing sewer main lines located 26 feet away from the project site on Lincoln Park Avenue (Pipe ID 49515022), maintained by the City Department of Public Works. The project does not propose on-site groundwater extraction to serve future uses and does not propose on-site wastewater treatment. The proposed 184 residential units and two-level of subterranean parking would not be anticipated to generate, store, or dispose of substantial quantities of hazardous materials that could affect water quality.

Stormwater runoff currently leaves the site by sheet flow and drains south to Mission Road and west to Lincoln Park Avenue where it is conveyed to culverts at the intersection of Lincoln Park Avenue and Mission Road or one (1) of two (2) existing catch basins located southwest of the project site at the intersection of Mission Road and Thomas Street. During the construction phase (including site preparation and grading), City Ordinance No. 178,132 would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) to minimize erosion and sediment from leaving the site via storm water runoff through the implementations of Best Management Practices (BMPs), such as silt fencing and/or sandbags to reduce the velocity of runoff leaving the site and filter storm water to reduce erosion or siltation offsite. During operations, stormwater runoff generated by the proposed buildings and hardscape surfaces would be required comply with the City Low Impact Development (LID) Ordinance No. 181899 to manage the quality of stormwater runoff to reduce offsite runoff and improve water quality through infiltration, evapotranspiration, retention for onsite use, or a biofiltration system, which will be included in the final design plans to be reviewed during plan check. Runoff generated by hardscape surfaces would also be required to comply with City Ordinance No. 172,176 and No. 173,494 which specify Stormwater and Urban Runoff Pollution Control requirements including the application of BMPs. Compliance with these applicable regulations would ensure the project would not have a significant adverse effect relating to water quality.

### **Construction Water Quality Impacts**

During construction, the project site would contain a variety of construction materials such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Spills of construction materials can be a source of stormwater pollution and/or soil contamination. All hazardous materials are to be stored, labeled and used in accordance with the U.S. Occupational Safety and Health Administration

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

regulations. These regulations for routine handling and storing of hazardous materials effectively control the potential stormwater pollution caused by these materials.

Earth moving activities would involve preparation of the project site for project construction. Soil erosion is the process by which soil particles are removed from the land surface, by wind, water and/or gravity. Soil particles removed by stormwater runoff can have negative impacts on downstream conditions through increased sedimentation as well as spread of contaminants found in the exposed soil of the Project Site. Grading activities can greatly increase erosion processes. Two general strategies are typically required to prevent construction silt from entering drainage courses. First, the amount of exposed soil is typically limited and erosion control procedures are implemented for those areas that must be exposed. Common methods for controlling fugitive dust emissions, such as covering truck loads and street sweeping, are also effective in controlling stormwater quality. Second, the construction area would be secured to control off-site migration of pollutants. Erosion control devices, including temporary diversion dikes/berms, drainage swales, and siltation basins, are typically required around construction areas to ensure that sediment is trapped and properly removed.

The Project's proposed construction activities would be required to comply with the State's General Construction National Pollutant Discharge Elimination System (NPDES) Permit and the development of a construction Storm Water Pollution Prevention Plan (SWPPP) because the project site is greater than one acre in size. The Project SWPPP would identify potential pollutant sources that may affect the quality of discharge associated with construction activity, identify non-storm water discharges, and provide design features to effectively prohibit the entry of pollutants into the public storm drain system during construction.

When properly designed and implemented, BMPs would ensure that construction of the Project would not result in degradation of surface water quality through increased sedimentation or spread of soil contaminants. Accordingly, required compliance with the City of Los Angeles grading permit regulations and implementation of BMPs would ensure that Project construction would not create a significant impact by degrading surface water quality, or by causing a violation of applicable water quality standards. Furthermore, review of the Seismic Hazard Zone Report for the Los Angeles Quadrangle (California Division of Mines and Geology [CDMG], 1998) indicates the historically highest groundwater level in the area is approximately 20 feet beneath the ground surface. Groundwater information presented in this document is generated from data collected in the early 1900's to the late 1990's. Based on current groundwater basin management practices, it is unlikely that groundwater levels will ever exceed the historic high levels. Based on the depth of proposed construction, static groundwater is generally not anticipated to be encountered during construction. Therefore, as the project site would not result in any significant effects related to construction surface water quality, the Project meets this condition for water quality.

### **Operational Water Quality Impacts**

Operation of the Project would introduce sources of potential water pollution that are typical of residential developments. Anticipated and potential pollutants generated by the project are sediment, nutrients, pesticides for landscaping, metals, pathogens, oil and grease and cleaning solvents. The Project's proposed residential land uses do not represent the type of use that would otherwise degrade water quality (e.g., an industrial land use that could adversely affect water

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

quality). Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Project site BMPs have been designed to prevent storm water pollution that includes stormwater drainage through Low Impact Development planters at each landscaped level – in the ground floor yards and on roof decks planned for the third, sixth, and seventh floors. Therefore, as the project site would not result in any significant effects related to operational surface water quality, the Project meets this condition for water quality.

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

The project site is located in an urbanized area of the City's Northeast Los Angeles Community Plan Area and is surrounded by parcels already developed with single- and multi-family uses served by existing utility and public service providers. The proposed project would be served by the same utility and public service providers that serve the adjacent site and surrounding vicinity under existing conditions, including:

- Los Angeles Fire Department Station 1
- Los Angeles Police Department Central Bureau
- City of Los Angeles Department of Public Works
- City of Los Angeles Department of Recreation and Parks

#### **Utilities: Electricity**

California Public Utilities Code (PUC) Section 9621 requires publicly owned utilities (POUs) with an annual electrical demand exceeding 700 gigawatt hours (GWh) to develop integrated resource plans (IRPs). IRPs are electricity system planning documents that describe how utilities plan to meet their energy and capacity resource needs between 2018 and 2030, while achieving policy goals and mandates, meeting physical and operational constraints, and fulfilling other priorities such as reducing effects on customer rates. Each IRP filing must include data and supporting information sufficient to demonstrate the utility is meeting these goals and targets. PUC Section 9621 requires the governing board of a POU to adopt an IRP and a process for updating it at least once every five years by January 1, 2019.

The California Energy Commission's (CEC) Publicly Owned Utility Integrated Resource Plan Submission and Review Guidelines require those utilities to file an IRP with data and supporting information sufficient to demonstrate that they meet these requirements and the various targets and planning goals from 2018 to 2030. The Energy Commission must review the IRPs to ensure consistency with the requirements of PUC Section 9621. The Los Angeles Department of Water and Power's (LADWP) 2017 Power Integrated Resource Plan, submitted on April 30, 2019, outlines the utility's strategy for procuring future resources that meet the requirements of PUC Section 9621.

Senate Bill 350 (De León, Chapter 547, Statutes of 2015) (SB 350) requires filing POUs to adopt an IRP that ensures system and local reliability and addresses resource adequacy requirements.<sup>19</sup> Staff reviewed the LADWP's capacity reporting table and discussion and finds that LADWP has planned for sufficient resources to maintain a reliable electric system. In addition, LADWP's selected portfolio of resources contains sufficient capacity to meet anticipated resource adequacy

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

requirements in 2030. Staff finds that the IRP is consistent with the reliability requirements in PUC Section 9621(b)(3) and resource adequacy requirements in PUC Section 9621(d)(1)(E).

LADWP is its own balancing authority and as such is responsible for operating its electricity system in real time. This is done by finely balancing power system demand and supply while ensuring reliability.<sup>20</sup> This includes controlling generation and transmission of electricity within its control area, as well as between balancing authorities. The Western Electricity Coordinating Council (WECC) establishes operating standards that all balancing authorities must meet to ensure reliability. State law also requires POUs to meet WECC's most recently approved planning reserve and reliability criteria and "prudently plan for and procure resources that are adequate to meet its planning reserve margin and peak demand and operating reserves, sufficient to provide reliable service to its customers."

North American Electric Reliability Corporation (NERC) operating standards prescribe the amount of contingency and replacement reserves that a balancing authority must have in case of a generation or transmission outage. To comply with NERC operating standards, LADWP must carry additional generating capacity above its instantaneous load. LADWP plans for a 15 percent reserve margin based on a 1-in-10 peak demand, which typically occurs on hot summer afternoons.<sup>22</sup> In addition to contingency reserve, LADWP plans for additional outages by carrying replacement reserves to cover unplanned outages of older generating units. LADWP also conducts an annual 10-year transmission assessment plan to maintain grid reliability and identify necessary improvements needed to avoid potential overloads on key segments of its transmission system.<sup>23</sup> LADWP's IRP filing demonstrates that the utility is planning appropriately to ensure reliable supplies for its customers.

LADWP continues to be in compliance with all applicable Federal Energy Regulatory Commission (FERC), North American Electric Reliability Corporation (NERC) and Western Electric Coordinating Council (WECC) standards regarding bulk power system reliability.

### **Utilities: Water**

LADWP's Water System is the nation's second largest municipal water utility and serves a population of 3.9 million people within 473 square miles. The Water System supplies approximately 191 billion gallons of water annually and an average of 524 million gallons per day for the 674,000 residential and business water service connections. LADWP can currently deliver 160 billion US gallons (606 million cubic meters) of water.

The project would be served by existing sewer line infrastructure including vertical laterals which connect to existing sewer main lines located 26 feet away from the project site on Lincoln Park Avenue (Pipe ID 49515022), maintained by the City Department of Public Works.

### **Utilities: Sanitation**

The site is served by LA Sanitation which maintains solid waste management facilities for the City of LA. The project site is situated 2.0 miles from LA Sanitation's North Central Collection Yard which will serve the project assuring timely and thorough collection of solid waste materials.

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

The proposed project would add one hundred eighty-four (184) new dwelling units to the site, consistent with existing planning and zoning (as described in Section II.a), on which utilities and public service agencies base their service and facility planning. The project would be served by existing public service providers and is consistent with existing planning and zoning. As described in Section III.a., below, the project's one hundred eighty-four (184) new apartment units would provide housing for an estimated 552 persons. The City projects its future population for the year 2040 to increase by 763,900, accommodating growth, such as the project's added population, that utilities and public service agencies use for planning purposes. As the increase in units would be within the projected City growth, the project would be adequately served by required utilities and public services.

### **III. CONSIDERATION OF EXCEPTIONS**

Section 15300.2 of the CEQA Statutes and Guidelines provides a list of exceptions for consideration of a project as categorically exempt. The exemptions that apply to the project are listed and discussed below:

**(a) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.**

Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State CEQA Guidelines Section 15130[b][1][A]). As shown, the project would not result in any project-specific significant impacts and would not have any impacts that are individually limited but cumulatively considerable.

This project proposes an infill development of residential uses within an urban setting surrounded by existing residential and commercial uses. The project's environmental effects regarding traffic, noise, and air quality would be less than significant, as discussed above. According to the Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS or Plan) Demographics & Growth Forecast, the population of the City of Los Angeles in 2012 was 3,845,500 with 1,325,500 households. Based on this data, the City's average household size is approximately three (3) persons per dwelling unit, and therefore, the project's 184 new apartment units would provide housing for an estimated 552 persons, which would represent an increase of 0.0014 percent in the City's population totals for the year 2012.

SCAG projects the City's future population and housing supply for the year 2040 in the 2016 RTP/SCS to increase by 763,900 and 364,800, respectively, over the 2012 estimates. As such, the project's net increase of 552 persons and 184 residential units on the site would represent less than 0.07 percent increase of the projected increases of population and 0.05 percent of the projected City increases of housing over that time period. The project's net increases of a small fraction of one percent of the projected growth in housing and population for the City would have a less than cumulatively considerable contribution to projected growth and any associated



## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

population related impacts such as increases in demand for municipal services that would arise from other foreseeable development. In addition, the project site is located within an urbanized area, is already developed with existing residential uses, and would not have any significant impacts, as evaluated in this Categorical Exemption analysis. Therefore, the proposed development of a 184-unit apartment building and removal of a 42-stall parking lot on the project site would not be expected to result in a considerable cumulative contribution to impacts involving other past, present, or future projects in the area.

Only one project, a 178-room student housing building and a 200-guest room hotel known as the USC Health Sciences Campus, has been proposed and/or constructed within the past two years within a ¼ mile distance of the proposed project site. Because construction of the USC Health Sciences Campus structures has already been completed, its construction impacts are not expected to overlap with that of the proposed project, which are detailed supra. Operational impacts of the USC Health Sciences Campus were analyzed pursuant to existing City regulations and policies. The project was required to submit formal review and analysis of expected project impacts from construction and operations and determined to have less than significant impacts or impacts that could be mitigated through the implementation of project-specific mitigation measures.

Long-term, or cumulative, effects are determined through a consistency check with the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects deemed consistent would have a less than significant cumulative impact on VMT.

Similar to the Project, all future projects in the State are subject to review for consistency with applicable State, regional and local plans, policies, or regulations for the reduction of GHGs. Therefore, based on the discussion above, and consistent with State CEQA Guidelines Section 15064(h)(3), the Project's generation of GHG emissions would not be cumulatively considerable because the Project would not conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of GHGs. Therefore, the Project's contribution to cumulative impacts to GHGs would not be cumulative considerable, and cumulative impacts would be less than significant.

With respect to operational impacts, development of the Project in combination with related projects would result in the further infilling in an already developed area. The existing City storm drain system would continue to serve the Project Site and the surrounding area. Runoff from the Project Site and the adjacent land uses is directed into the adjacent streets, where it flows to the drainage system. It is likely that most, if not all, related projects would also drain to the surrounding street system or otherwise retain stormwater on-site as all projects would comply with existing stormwater/LID requirements, which would ensure impacts are less than significant.

Development of the Project in combination with related projects would cumulatively increase the demand for fire and police protection services. Over time, the Los Angeles Fire Department (LAFD) and Los Angeles Police Department (LAPD) would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, other special apparatuses, and possibly station

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

expansions or new station construction that may become necessary to achieve the desired level of service. The City's regular budgeting efforts identify LAFD's and LAPD's resource needs and allocate funding according to the priorities at the time. Any new or expanded fire or police services or facilities would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and cumulative growth would contribute. Moreover, LAFD and LAPD would review all of the cumulative development in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, Fire Code requirements related to fire safety, access, and fire flow, and the implementation of safety and security features according to LAPD recommendations would ensure that cumulative impacts to fire and police protection services would be less than significant.

Development of related projects would occur in accordance with adopted plans and regulations. Most of related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

**(b) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.**

The construction and operation of the proposed seven-story apartment building with one hundred eighty-four units surrounded by existing residential, commercial, and municipal uses would not have a significant effect on the environment due to unusual circumstances. As discussed in Section II, the project would not have a significant effect on the environment, and there are no unusual site conditions or issues that would warrant further environmental analysis.

**(c) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.**

There are no designated state scenic highways located within the project vicinity. According to the Mobility Plan 2035, an Element of the City's General Plan, the project is located approximately 20 feet from a Boulevard II, Mission Road. However, the project would not result in damage to scenic resources as the site is located in an urbanized area and is infill development. Therefore, the project would not impact resources located within an officially designated state scenic highway.

**(d) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.**

The project is not located within a site which is included in any list compiled pursuant to Section 65962.5 of the Government Code, commonly referred to as the Cortese List. The site is not listed on the California Department of Toxic Substances Control maintained EnviroStor online data management system for tracking cleanup, permitting, enforcement, and investigation efforts at

## **Assessment of 3601 E Mission Road Project Eligibility for a Categorical Exemption as a Class 32 In-Fill Development**

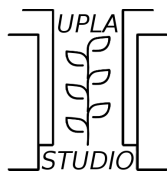
hazardous waste facilities and sites with known or suspected contamination issues and is not listed on the State Water Resources Control Board GeoTracker online data management system for tracking sites that require cleanup, such as Leaking Underground Storage Tanks (LUSTs). Therefore, the project is not identified as a hazardous waste site and would not be in conflict with this exception for a Class 32 In-Fill Development Categorical Exemption.

**(e) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.**

The project site was not identified on Historic Places LA, the Los Angeles Historic Resources Inventory, or in the City's Zone Information and Map Access System (ZIMAS) as a Los Angeles Historical Cultural Monument, Los Angeles Historic Preservation Overlay Zone, National Register of Historic Places, Potential Historic Multi-Family Resident, Existing or Potential Residential Historic District or National Historic Landmark. Based on Historic Places LA, the ZIMAS database and site plans, the project would not cause a substantial adverse change in the significance of a historical resource.

### **IV. CONCLUSION**

Based on the above information and above documentation, this analysis shows that development of the proposed 3601 Mission Road Project would be consistent with the criteria for a Class 32 Categorical Exemption under CEQA Statute Section 15332.



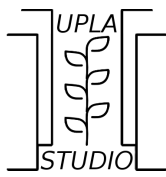
## Appendix A

### Protected Tree Report

1. Tree Expert: Stephanie Reed, Landscape Architect 6086, ISA Certified Arborist  
WE-11453A, 4572 Via Marina #105, Marina del Rey, CA 90292. phone:(424)385-8721.  
email: stephanie@upla.studio
2. PTR Prepared by: Stephanie Reed
3. Prepared for: KSA Design Studio, 6150 Washington Blvd, Culver City, CA 90232. phone:  
310-574-4460. email: a.stinson@ksa-la.com
4. Site Address and description: 3601 Mission Road, Los Angeles, CA 90031. APN:  
5211-009-015. The site is currently a paved commercial parking lot.
5. Date Prepared: 09-13-2022
6. Date of Field Survey: 06-30-2022
7. PTR Purpose: KSA Design Studio contacted the arborist with requirements for the city of  
Los Angeles for a protected tree report (PTR) for land development purposes. This report  
is being prepared in accordance with the City of Los Angeles Protected Tree Ordinance  
No. **186873**.
8. Table of Contents [Listed Below]
9. Project Description and Background: Developer plans to remove all existing structures,  
grade and develop a multi-story, multi-unit residential structure.
10. Square footage of Entire Property: 50,656 SF. Square footage of proposed structure:  
152,000 SF

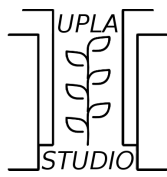
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11. Field Observations:

FIELD OBSERVATION MATRIX - Protected Trees										Non Protected Trees		
Address: 3601 N Mission Rd												
Date: June 2022												
Time: 12:00 PM												
APN: 5211-009-015												
Weather: Overcast												
Form		Physical Condition								Treatment	Rating	Rating Code
Size												
Tree Number												
<i>Quercus agrifolia</i>												
<i>Umbellularia californica</i>												
<i>Juglans californica</i>												
<i>Platanus racemosa</i>												
<i>Sambucus mexicana</i>												
<i>Heteromeles arbutifolia</i>												
Trunk Dia. @ 4.5' above base (in)												
Height (ft)												
Spread (ft)												
Tree Declining												
Drought Stressed												
Broken Hanging Limb(s)												
Weak Main Crotch(s)												
Sparse Foliage												
Fire Damage												
Cavity(s) in tree												
Trunk Damage or Exudation												
Hollow Trunk or Cavity												
Mainstem Dieback												
Insect Damaged												
Diseased												
Leaning												
Soil Buildup at Base												
Regrown Stump												
Surface Roots												
Safety Hazard												
Safety Prune (Crown Reduction)												
Raise Canopy												
Remove Deadwood												
Insect Treatment												
Health												
Aesthetics & Conformity												
Balance												
A = EXCELLENT B = GOOD C = FAIR D = POOR E = NEARLY DEAD F = DEAD R = Remove for Construct I = Impacted T = Transplantable NT = Not Transplantable BMC = Below Main Crotch Remarks												



## 12. Findings:

The definition of Protected Tree in Section 17.02 of the Los Angeles Municipal Code reads as follows:

**Protected Tree or Shrub** (Amended by Ord. No. 186,873, Eff. 2/4/21.) – Any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub:

### Protected Trees:

(a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to Southern California but excluding the Scrub Oak (*Quercus berberidifolia*).

(b) Southern California Black Walnut (*Juglans californica*).

(c) Western Sycamore (*Platanus racemosa*).

(d) California Bay (*Umeellularia californica*).

### Protected Shrubs:

(a) Mexican Elderberry (*Sambucus mexicana*).

(b) Toyon (*Heteromeles arbutifolia*).

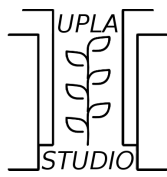
**The definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.**

There are 5 Sycamore trees grown from nursery stock on sites that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

There are several trees on abutting property that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

There are several street trees in the right-of way that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

Previous development plans and historic photos of the site show evidence that the Sycamore trees are not naturally occurring. See item 24. Other information for Demolition plan, landscape plan, and historic site photos.



13. Recommendations:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

14. Trees tagged and numbered:

No trees have been tagged, however all have been assigned numbers and identified in this report.

15. Mitigation:

There are no protected trees on site, and no mitigation is required.

16. Protected Tree Construction Impact Guidelines:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

17. Matrix summarizing observations (protected trees)

Total number of protected trees on map:	<u>0</u>
Total Number of Declining or dead protected trees:	<u>0</u>
Total number of protected trees to be impacted by construction within dripline:	<u>0</u>
Total number of protected trees not dead, not removed or impacted:	<u>0</u>

18. Proposed protected tree removals

Tree Number	Species	Height	DBH	Spread	Condition	Suggested Treatment	Rating	Other
none								

19. Proposed protected trees remaining

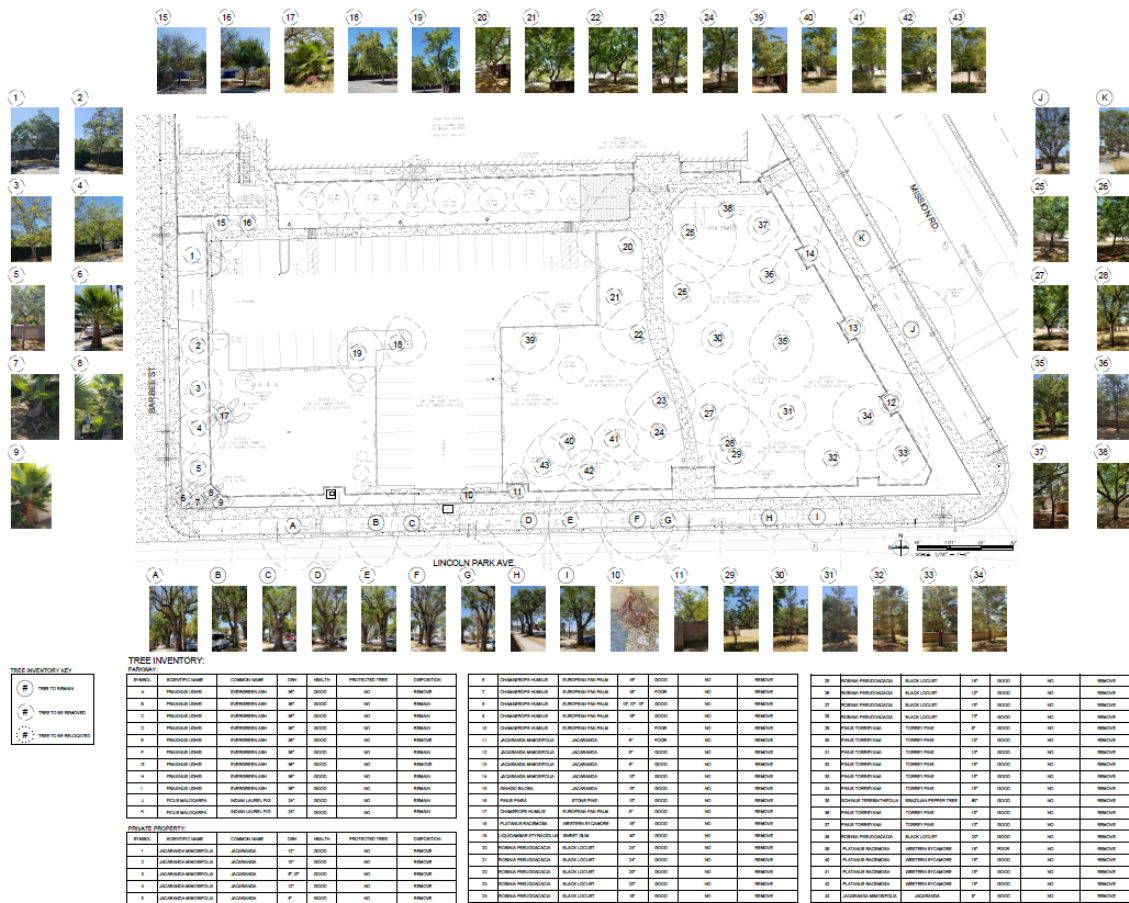
Tree Number	Species	Height	DBH	Spread	Condition	Suggested Treatment	Rating	Other
none								

20. Color Photos of Protected Trees.

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

## 21. Topo map with trees plotted

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.



ARCHITECT: **UPLA STUDIO**

LANDSCAPE ARCHITECT: **UPLA STUDIO**

DESIGNED BY: **UPLA STUDIO**

CLIENT: **LINCOLN PARK HOLDINGS LLC**

100 S ORANGE AVE, LOS ANGELES, CA 90031  
 (213) 462-8888

3601 MISSION

3601 MISSION ROAD, LOS ANGELES, CA 90031

DATE: **ENTITLEMENT SET 08.15.22**

NOT FOR CONSTRUCTION

REVISION LIST:

REV	DESCRIPTION	DATE
1	ISSUED FOR PERMIT	08.15.22

KEY PLAN:

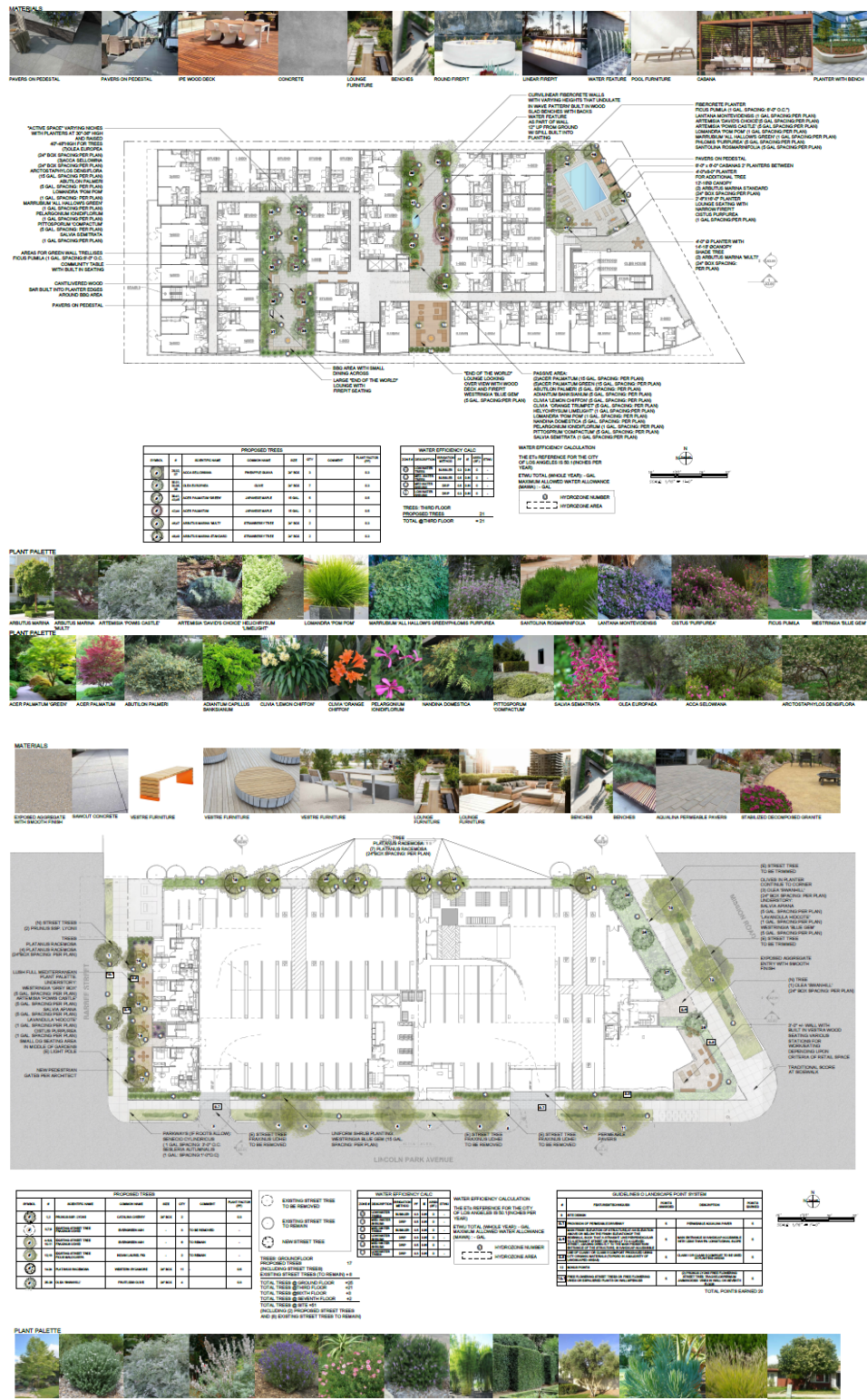
PROJECT NO: **L0.1**

CAD FILE: **L0.1.dwg**



## 22. Landscape Plan

There are no replacement trees or other mitigation required.



## 23. Current Licenses and certificates

Remove your new Pocket Certificate from the receipt portion and carry it with you at all times.

7/15/21  
7/15/21

CUT HERE

CALIFORNIA ARCHITECTS BOARD  
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE  
2420 DEL PASO ROAD, SUITE 105  
SACRAMENTO, CA 95834  
916 575-7230

STATE OF CALIFORNIA  
**dca**  
DEPARTMENT OF CONSUMER AFFAIRS

LANDSCAPE ARCHITECT

CERTIFICATE NO. 6086

STEPHANIE ANNE REED  
4572 VIA MARINA APT 105  
MARINA DEL REY CA 90292

EXPIRATION 09/30/23

LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE  
2420 DEL PASO ROAD, SUITE 105  
SACRAMENTO, CA 95834  
916 575-7230

IMPORTANT

1. Please include your Certificate Number on any correspondence to this office.
2. Notify the Program of any name or address change in writing.
3. Report any loss of this certificate immediately in writing to the Program.
4. Please sign and carry the Pocket Certificate with you.

STEPHANIE ANNE REED

Signature \_\_\_\_\_

RECEIPT NO. 11962001

CERTIFICATE NO. 6086

EXPIRATION DATE 09/30/23

RECEIPT NO. 11962001

This is your receipt. Please save for your records.

PLALA 10/31/07



## The International Society of Arboriculture

Hereby Announces That

*Stephanie Reed*

Has Earned the Credential

## ISA Certified Arborist ®

By successfully meeting ISA Certified Arborist certification requirements through demonstrated attainment of relevant competencies as supported by the ISA Credentialing Council

*Caitlyn Pollihan*  
Caitlyn Pollihan  
CEO & Executive Director

30 January 2016

Issue Date

30 June 2025

Expiration Date

WE-11453A

Certification Number



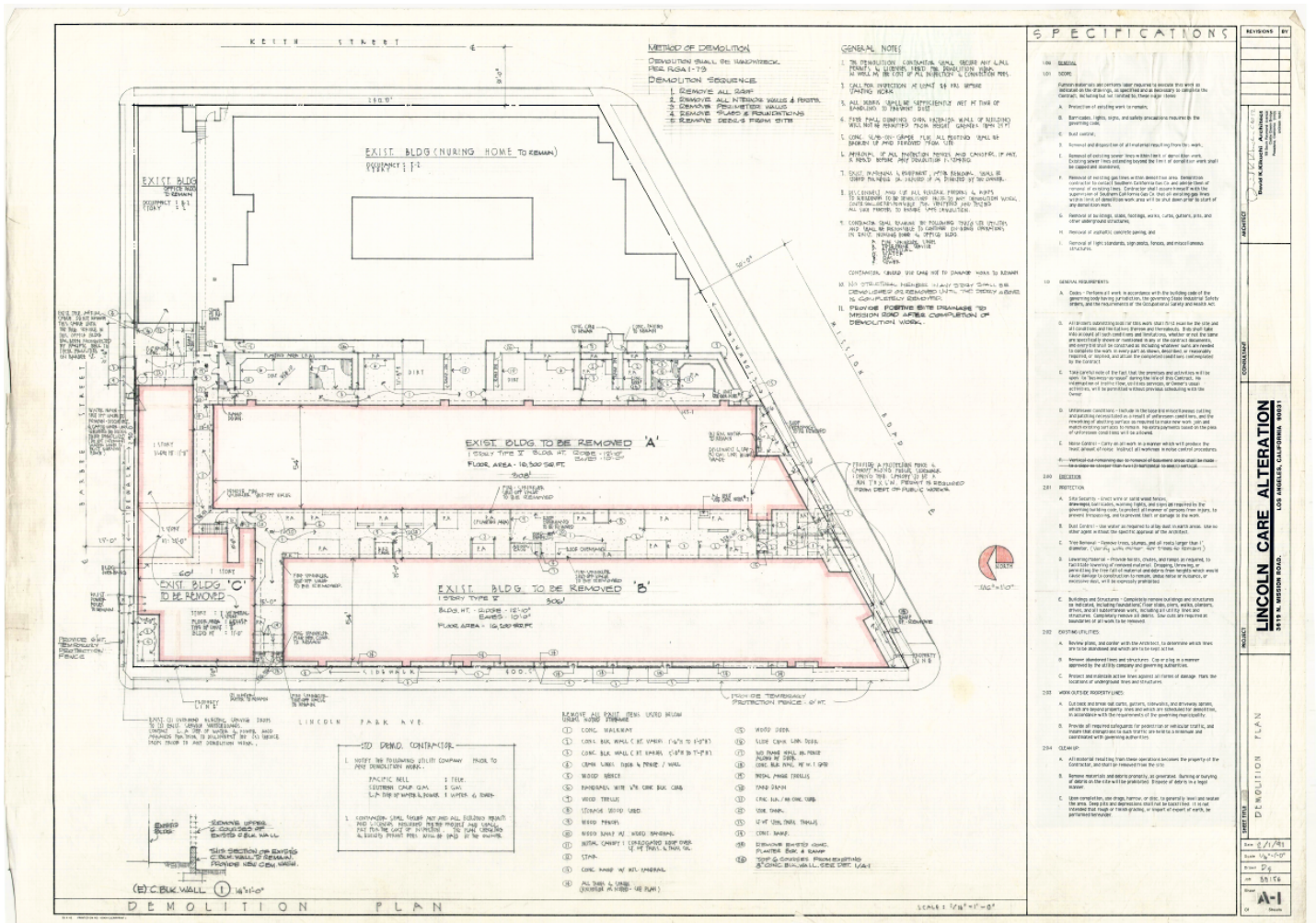


## 24. Other information

The geotechnical report, submitted separately, shows that the site was previously developed on compacted backfill. The structural engineer has required that the building footprint will need to be over-excavated by 5 feet in addition to the 3 feet for the foundation.

Please review the following documents as evidence that the Sycamore trees are not naturally occurring:

- A. Demolition plan from 1989 showing that there were buildings at the exact location of the Sycamores. In other words, the trees could not have existed there before that time.



- B. Site photos taken by the previous owner in July 1999, before they renovated the site, clearly showing that the yard area in question did not have the sycamores at that time.

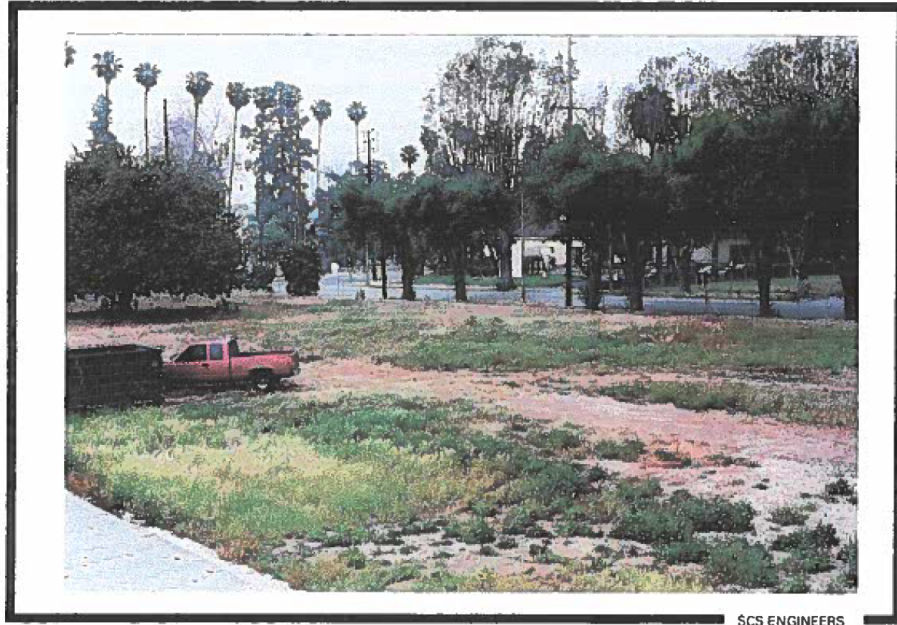


Photo 7. View Southwest Across Western Half of Project Site.

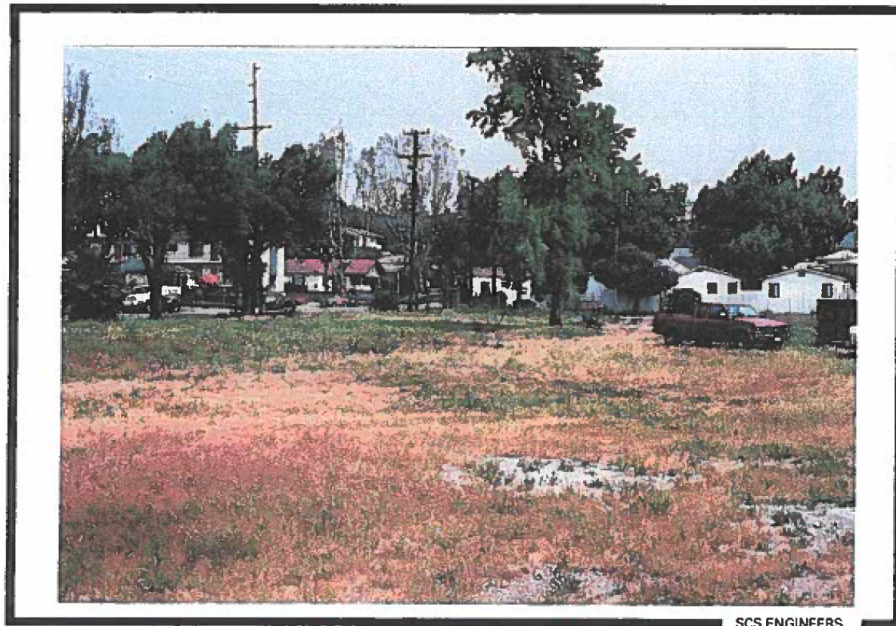
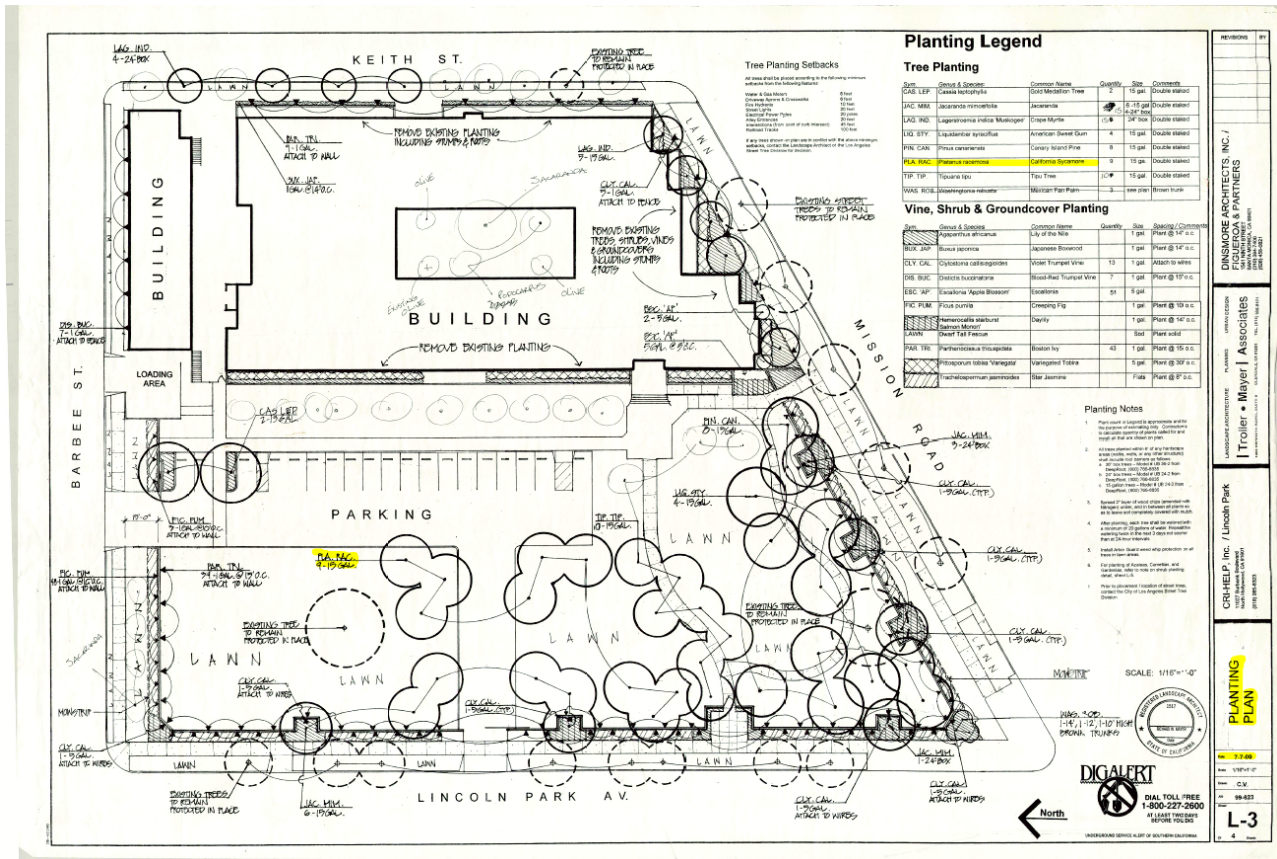


Photo 8. View Northwest Across Western Half of Project Site.



C. Previous Owner's Landscaping plans from July 7, 2000 - this was a part of the renovation drawings set when Cri-Help converted the entire site for their use - which clearly indicate that they planted 9, 15 Gallons CA Sycamores in the exact location the existing Sycamores are located. The highlighted areas pertain to the Sycamores. As we know, only 5 tree currently exist there, but we can't really tell if the other 4 were previously removed or didn't grow by themselves.



25. Arborist's opinion whether naturally occurring

It is the arborist's opinion that the Sycamore trees have been planted by nursery stock and as such are not protected by the Los Angeles Tree Protection Ordinance.

## 26. Pictures of Protective fencing

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

27. Reason for Removal:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

# Appendix B

## CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



*Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?*

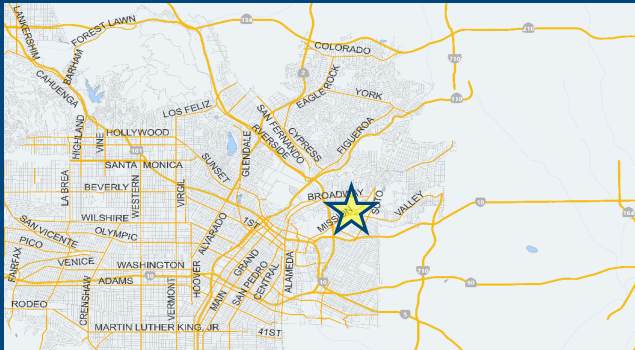
### Project Information

**Project:** 3601 Mission Apartment Project

**Scenario:**

[www](#)

**Address:** 3601 N MISSION ROAD, 90031



**Is the project replacing an existing number of residential units with a smaller number of residential units AND is located within one-half mile of a fixed-rail or fixed-guideway transit station?**

☒ Yes

☐ No

### Existing Land Use

**Land Use Type** **Value** **Unit**

Housing | Single Family

☐ Click here to add a single custom land use type (will be included in the above list)

### Proposed Project Land Use

**Land Use Type** **Value** **Unit**

Housing | Affordable Housing - Family  47 DU

Housing | Multi-Family 137 DU

Housing | Affordable Housing - Family 47 DU

☐ Click here to add a single custom land use type (will be included in the above list)

### Project Screening Summary

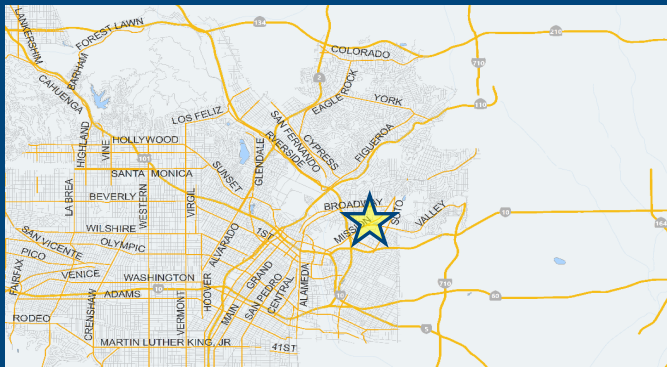
Existing Land Use	Proposed Project
0 Daily Vehicle Trips	892 Daily Vehicle Trips
0 Daily VMT	6,412 Daily VMT
<b>Tier 1 Screening Criteria</b>	
Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. <input type="checkbox"/>	
<b>Tier 2 Screening Criteria</b>	
The net increase in daily trips < 250 trips	892 Net Daily Trips
The net increase in daily VMT ≤ 0	6,412 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	0.000 ksf
<b>The proposed project is required to perform VMT analysis.</b>	

# CITY OF LOS ANGELES VMT CALCULATOR Version 1.3



## Project Information

**Project:** 3601 Mission Apartment Project  
**Scenario:**  
**Address:** 3601 N MISSION ROAD, 90031



Proposed Project Land Use Type	Value	Unit
Housing   Multi-Family	137	DU
Housing   Affordable Housing - Family	47	DU

## TDM Strategies

Select each section to show individual strategies

Use ☒ to denote if the TDM strategy is part of the proposed project or is a mitigation strategy

	Proposed Project	With Mitigation
<b>Max Home Based TDM Achieved?</b>	No	No
<b>Max Work Based TDM Achieved?</b>	No	No
<b>A</b> Parking		
<b>B</b> Transit		
<b>C</b> Education & Encouragement		
<b>D</b> Commute Trip Reductions		
<b>E</b> Shared Mobility		
<b>F</b> Bicycle Infrastructure		
Implement/Improve On-street Bicycle Facility		
Select Proposed Prj or Mitigation to include this strategy		
<input type="checkbox"/> Proposed Prj <input type="checkbox"/> Mitigation		
Include Bike Parking Per LAMC		
Select Proposed Prj or Mitigation to include this strategy		
<input checked="" type="checkbox"/> Proposed Prj <input type="checkbox"/> Mitigation		
Include Secure Bike Parking and Showers		
Select Proposed Prj or Mitigation to include this strategy		
<input type="checkbox"/> Proposed Prj <input type="checkbox"/> Mitigation		
<b>G</b> Neighborhood Enhancement		

## Analysis Results

Proposed Project	With Mitigation
<b>734</b> Daily Vehicle Trips	<b>734</b> Daily Vehicle Trips
<b>5,281</b> Daily VMT	<b>5,281</b> Daily VMT
<b>5.7</b> Household VMT per Capita	<b>5.7</b> Household VMT per Capita
<b>N/A</b> Work VMT per Employee	<b>N/A</b> Work VMT per Employee
<b>Significant VMT Impact?</b>	
<b>Household: No</b> Threshold = 7.2 15% Below APC	<b>Household: No</b> Threshold = 7.2 15% Below APC
<b>Work: N/A</b> Threshold = 12.7 15% Below APC	<b>Work: N/A</b> Threshold = 12.7 15% Below APC

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 1: Project & Analysis Overview

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

Project Information			
Land Use Type		Value	Units
Housing	Single Family	0	DU
	Multi Family	137	DU
	Townhouse	0	DU
	Hotel	0	Rooms
	Motel	0	Rooms
Affordable Housing	Family	47	DU
	Senior	0	DU
	Special Needs	0	DU
	Permanent Supportive	0	DU
Retail	General Retail	0.000	ksf
	Furniture Store	0.000	ksf
	Pharmacy/Drugstore	0.000	ksf
	Supermarket	0.000	ksf
	Bank	0.000	ksf
	Health Club	0.000	ksf
	High-Turnover Sit-Down Restaurant	0.000	ksf
	Fast-Food Restaurant	0.000	ksf
	Quality Restaurant	0.000	ksf
	Auto Repair	0.000	ksf
	Home Improvement Superstore	0.000	ksf
	Free-Standing Discount	0.000	ksf
	Movie Theater	0	Seats
Office	General Office	0.000	ksf
	Medical Office	0.000	ksf
Industrial	Light Industrial	0.000	ksf
	Manufacturing	0.000	ksf
	Warehousing/Self-Storage	0.000	ksf
	University	0	Students



# CITY OF LOS ANGELES VMT CALCULATOR

## Report 1: Project & Analysis Overview

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

<i>School</i>	<i>High School</i>	<i>0</i>	<i>Students</i>
	<i>Middle School</i>	<i>0</i>	<i>Students</i>
	<i>Elementary</i>	<i>0</i>	<i>Students</i>
	<i>Private School (K-12)</i>	<i>0</i>	<i>Students</i>
<i>Other</i>		<i>0</i>	<i>Trips</i>

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 1: Project & Analysis Overview

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

Analysis Results			
Total Employees: 0			
Total Population: 456			
Proposed Project		With Mitigation	
734	Daily Vehicle Trips	734	Daily Vehicle Trips
5,281	Daily VMT	5,281	Daily VMT
5.7	Household VMT per Capita	5.7	Household VMT per Capita
N/A	Work VMT per Employee	N/A	Work VMT per Employee
Significant VMT Impact?			
APC: East Los Angeles			
Impact Threshold: 15% Below APC Average			
Household = 7.2			
Work = 12.7			
Proposed Project		With Mitigation	
VMT Threshold	Impact	VMT Threshold	Impact
Household > 7.2	No	Household > 7.2	No
Work > 12.7	N/A	Work > 12.7	N/A

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

TDM Strategy Inputs				
Strategy Type		Description	Proposed Project	Mitigations
Parking	Reduce parking supply	City code parking provision (spaces)	215	215
		Actual parking provision (spaces)	103	103
	Unbundle parking	Monthly cost for parking (\$)	\$85	\$85
	Parking cash-out	Employees eligible (%)	0%	0%
	Price workplace parking	Daily parking charge (\$)	\$0.00	\$0.00
		Employees subject to priced parking (%)	0%	0%
	Residential area parking permits	Cost of annual permit (\$)	\$0	\$0
(cont. on following page)				

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

TDM Strategy Inputs, Cont.			
Strategy Type	Description	Proposed Project	Mitigations
<b>Transit</b>	<i>Reduction in headways (increase in frequency) (%)</i>	0%	0%
	<i>Reduce transit headways</i>	0%	0%
	<i>Existing transit mode share (as a percent of total daily trips) (%)</i>	0%	0%
	<i>Lines within project site improved (&lt;50%, &gt;=50%)</i>	0	0
	<i>Implement neighborhood shuttle</i>	0	0
	<i>Employees and residents eligible (%)</i>	0%	0%
<b>Transit</b>	<i>Transit subsidies</i>	0%	0%
	<i>Amount of transit subsidy per passenger (daily equivalent) (\$)</i>	\$0.00	\$0.00
	<i>Employees and residents participating (%)</i>	0%	0%
<b>Education &amp; Encouragement</b>	<i>Voluntary travel behavior change program</i>	0%	0%
	<i>Promotions and marketing</i>	0%	0%
(cont. on following page)			

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Commute Trip Reductions	Required commute trip reduction program	Employees participating (%)	0%	0%
	Alternative Work Schedules and Telecommute Program	Employees participating (%)	0%	0%
		Type of program	0	0
	Employer sponsored vanpool or shuttle	Degree of implementation (low, medium, high)	0	0
		Employees eligible (%)	0%	0%
		Employer size (small, medium, large)	0	0
	Ride-share program	Employees eligible (%)	0%	0%
Shared Mobility	Car share	Car share project setting (Urban, Suburban, All Other)	0	0
	Bike share	Within 600 feet of existing bike share station - OR- implementing new bike share station (Yes/No)	0	0
	School carpool program	Level of implementation (Low, Medium, High)	0	0
(cont. on following page)				

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 2: TDM Inputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

TDM Strategy Inputs, Cont.				
Strategy Type		Description	Proposed Project	Mitigations
Bicycle Infrastructure	Implement/Improve on-street bicycle facility	Provide bicycle facility along site (Yes/No)	0	0
	Include Bike parking per LAMC	Meets City Bike Parking Code (Yes/No)	Yes	Yes
	Include secure bike parking and showers	Includes indoor bike parking/lockers, showers, & repair station (Yes/No)	0	0
Neighborhood Enhancement	Traffic calming improvements	Streets with traffic calming improvements (%)	0%	0%
		Intersections with traffic calming improvements (%)	0%	0%
	Pedestrian network improvements	Included (within project and connecting off-site/within project only)	0	0

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 3: TDM Outputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

### TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		Home Based Work Production		Home Based Work Attraction		Home Based Other Production		Home Based Other Attraction		Non-Home Based Other Production		Non-Home Based Other Attraction	
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
Parking	Reduce parking supply	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%	13%
	Unbundle parking	10%	10%	0%	0%	10%	10%	0%	0%	0%	0%	0%	0%
	Parking cash-out	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Price workplace parking	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Residential area parking permits	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Transit	Reduce transit headways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Implement neighborhood shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Transit subsidies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Education & Encouragement	Voluntary travel behavior change program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Promotions and marketing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Commute Trip Reductions	Required commute trip reduction program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Alternative Work Schedules and Telecommute Program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Employer sponsored vanpool or shuttle	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
	Ride-share program	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Shared Mobility	Car-share	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Bike share	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	School carpool program	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 3: TDM Outputs

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

### TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		<i>Home Based Work Production</i>		<i>Home Based Work Attraction</i>		<i>Home Based Other Production</i>		<i>Home Based Other Attraction</i>		<i>Non-Home Based Other Production</i>		<i>Non-Home Based Other Attraction</i>	
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
<b>Bicycle Infrastructure</b>	Implement/ Improve on-street bicycle facility	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Include Bike parking per LAMC	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%
	Include secure bike parking and showers	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Neighborhood Enhancement</b>	Traffic calming improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Pedestrian network improvements	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

### Final Combined & Maximum TDM Effect

		<i>Home Based Work Production</i>		<i>Home Based Work Attraction</i>		<i>Home Based Other Production</i>		<i>Home Based Other Attraction</i>		<i>Non-Home Based Other Production</i>		<i>Non-Home Based Other Attraction</i>	
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
<b>COMBINED TOTAL</b>		22%	22%	13%	13%	22%	22%	13%	13%	13%	13%	13%	13%
<b>MAX. TDM EFFECT</b>		22%	22%	13%	13%	22%	22%	13%	13%	13%	13%	13%	13%

$$= \text{Minimum } (X\%, 1 - [(1-A) * (1-B) \dots])$$

where X%=

<b>PLACE TYPE MAX:</b>	urban	75%
	compact infill	40%
	suburban center	20%
	suburban	15%

Note:  $(1 - [(1-A) * (1-B) \dots])$  reflects the dampened combined effectiveness of TDM Strategies (e.g., A, B, ...). See the TDM Strategy Appendix (*Transportation Assessment Guidelines Attachment G*) for further discussion of dampening.



<i>Source</i>
TDM Strategy Appendix, Parking sections 1 - 5
TDM Strategy Appendix, Transit sections 1 - 3
TDM Strategy Appendix, Education & Encouragement sections 1 - 2
TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
TDM Strategy Appendix, Shared Mobility sections 1 - 3



<i>Source</i>
TDM Strategy Appendix, Bicycle Infrastructure sections 1 - 3
TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 3

# CITY OF LOS ANGELES VMT CALCULATOR

## Report 4: MXD Methodology

Date: August 16, 2022

Project Name: 3601 Mission Apartment Project

Project Scenario:

Project Address: 3601 N MISSION ROAD, 90031

### MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT
Home Based Work Production	163	-23.3%	125	9.4	1,532
Home Based Other Production	450	-23.1%	346	6.2	2,790
Non-Home Based Other Production	210	-1.9%	206	8.0	1,680
Home-Based Work Attraction	0	0.0%	0	13.0	0
Home-Based Other Attraction	214	-22.4%	166	6.1	1,305
Non-Home Based Other Attraction	51	-3.9%	49	8.8	449

### MXD Methodology with TDM Measures

	<i>Proposed Project</i>			<i>Project with Mitigation Measures</i>	
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips
Home Based Work Production	-21.9%	98	917	-21.9%	98
Home Based Other Production	-21.9%	270	1,675	-21.9%	270
Non-Home Based Other Production	-13.0%	179	1,433	-13.0%	179
Home-Based Work Attraction	-13.0%	0	0	-13.0%	0
Home-Based Other Attraction	-13.0%	144	881	-13.0%	144
Non-Home Based Other Attraction	-13.0%	43	375	-13.0%	43

### MXD VMT Methodology Per Capita & Per Employee

Total Population: 456

Total Employees: 0

APC: East Los Angeles

	<i>Proposed Project</i>	<i>Project with Mitigation Measures</i>
<i>Total Home Based Production VMT</i>	<b>2,592</b>	<b>2,592</b>
<i>Total Home Based Work Attraction VMT</i>	<b>0</b>	<b>0</b>
<i>Total Home Based VMT Per Capita</i>	<b>5.7</b>	<b>5.7</b>
<i>Total Work Based VMT Per Employee</i>	<b>N/A</b>	<b>N/A</b>

MXD VMT
1,175
2,145
1,648
0
1,013
431

asures
Mitigated VMT
917
1,675
1,433
0
881
375

asures

# Appendix C

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Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

## **Mission and Lincoln Apartments Los Angeles-South Coast County, Annual**

### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	184.00	Dwelling Unit	1.16	217,885.00	526

#### 1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	12			Operational Year	2025
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	691.98	CH4 Intensity (lb/MW hr)	0.033	N2O Intensity (lb/MW hr)	0.004

#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - known lot area

Construction Phase - No structure demolition is occurring; only concrete and asphalt removal

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	10.00
tblLandUse	LandUseSquareFeet	184,000.00	217,885.00
tblLandUse	LotAcreage	4.84	1.16

### 2.0 Emissions Summary

#### 2.1 Overall Construction

##### Unmitigated Construction

Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual  
**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N 2	CO2e
Year	tons/yr										MT/yr					
2023	0.1136	0.7813	0.9998	2.1800e-003	0.1032	0.0325	0.1357	0.0320	0.0312	0.0632	0.0000	189.6986	189.6986	0.0226	4.3	191.5456
2024	0.7742	0.6199	0.8751	1.9200e-003	0.0776	0.0240	0.1016	0.0208	0.0230	0.0438	0.0000	166.8857	166.8857	0.0184	3.8	168.4948
Maximum	0.7742	0.7813	0.9998	2.1800e-003	0.1032	0.0325	0.1357	0.0320	0.0312	0.0632	0.0000	189.6986	189.6986	0.0226	4.3	191.5456

**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	N 2	CO2e
Year	tons/yr										MT/yr					
2023	0.1136	0.7813	0.9998	2.1800e-003	0.1032	0.0325	0.1357	0.0320	0.0312	0.0632	0.0000	189.6984	189.6984	0.0226	4.3	191.5454
2024	0.7742	0.6199	0.8751	1.9200e-003	0.0776	0.0239	0.1016	0.0208	0.0230	0.0438	0.0000	166.8855	166.8855	0.0184	3.8	168.4947
Maximum	0.7742	0.7813	0.9998	2.1800e-003	0.1032	0.0325	0.1357	0.0320	0.0312	0.0632	0.0000	189.6984	189.6984	0.0226	4.3	191.5454

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.02	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)			
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## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

1	7-1-2023	9-30-2023	0.4170	0.4170
2	10-1-2023	12-31-2023	0.4876	0.4876
3	1-1-2024	3-31-2024	0.4558	0.4558
4	4-1-2024	6-30-2024	0.9360	0.9360
		Highest	0.9360	0.9360

**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	N	CO2e
Category	tons/yr										MT/yr					
Area	1.5151	0.0696	3.0654	3.0800e-003		0.1862	0.1862		0.1862	0.1862	19.5443	40.6570	60.2013	0.0613	1.3	62.1280
Energy	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	328.0062	328.0062	0.0126	3.2	329.2821
Mobile	0.4899	0.5520	5.0561	0.0112	1.2217	8.1400e-003	1.2299	0.3260	7.5600e-003	0.3335	0.0000	1,033.8228	1,033.8228	0.0709	0.0	1,048.9185
Waste						0.0000	0.0000		0.0000	0.0000	17.1812	0.0000	17.1812	1.0154	0.0	42.5656
Water						0.0000	0.0000		0.0000	0.0000	3.8034	75.3518	79.1552	0.3942	9.6	91.8895
<b>Total</b>	<b>2.0157</b>	<b>0.7127</b>	<b>8.1603</b>	<b>0.0148</b>	<b>1.2217</b>	<b>0.2017</b>	<b>1.4235</b>	<b>0.3260</b>	<b>0.2011</b>	<b>0.5271</b>	<b>40.5288</b>	<b>1,477.8379</b>	<b>1,518.3667</b>	<b>1.5544</b>	<b>0.0</b>	<b>1,574.7836</b>

**Mitigated Operational**

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2	CO2e
Category	tons/yr										MT/yr					
Area	1.5151	0.0696	3.0654	3.0800e-003		0.1862	0.1862		0.1862	0.1862	19.5443	40.6570	60.2013	0.0613	1.3	62.1280
Energy	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	328.0062	328.0062	0.0126	3.2	329.2821
Mobile	0.4899	0.5520	5.0561	0.0112	1.2217	8.1400e-003	1.2299	0.3260	7.5600e-003	0.3335	0.0000	1,033.8228	1,033.8228	0.0709	0.0	1,048.9185
Waste						0.0000	0.0000		0.0000	0.0000	17.1812	0.0000	17.1812	1.0154	0.0	42.5656
Water						0.0000	0.0000		0.0000	0.0000	3.8034	75.3518	79.1552	0.3942	9.6	91.8895
<b>Total</b>	<b>2.0157</b>	<b>0.7127</b>	<b>8.1603</b>	<b>0.0148</b>	<b>1.2217</b>	<b>0.2017</b>	<b>1.4235</b>	<b>0.3260</b>	<b>0.2011</b>	<b>0.5271</b>	<b>40.5288</b>	<b>1,477.8379</b>	<b>1,518.3667</b>	<b>1.5544</b>	<b>0.0</b>	<b>1,574.7836</b>

	ROG	NOx	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	7/1/2023	7/14/2023	5	10	
2	Site Preparation	Site Preparation	7/29/2023	8/1/2023	5	2	
3	Grading	Grading	8/2/2023	8/7/2023	5	4	
4	Building Construction	Building Construction	8/8/2023	5/13/2024	5	200	
5	Paving	Paving	5/14/2024	5/27/2024	5	10	
6	Architectural Coating	Architectural Coating	5/28/2024	6/10/2024	5	10	

Acres of Grading (Site Preparation Phase): 1.88



## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****Acres of Grading (Grading Phase): 4****Acres of Paving: 0****Residential Indoor: 441,217; Residential Outdoor: 147,072; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	7.00	97	0.37
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Building Construction	Welders	3	8.00	46	0.45
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Paving	Pavers	1	6.00	130	0.42
Paving	Paving Equipment	1	8.00	132	0.36
Paving	Rollers	1	7.00	80	0.38
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

**Trips and VMT**



## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

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	1.6000e-004	2.2100e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5670	0.5670	2.0000e-005	1.0	0.5717
<b>Total</b>	<b>2.1000e-004</b>	<b>1.6000e-004</b>	<b>2.2100e-003</b>	<b>1.0000e-005</b>	<b>7.1000e-004</b>	<b>0.0000</b>	<b>7.2000e-004</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>0.5670</b>	<b>0.5670</b>	<b>2.0000e-005</b>	<b>1.0</b>	<b>0.5717</b>

**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	N2	CO2e
Category	tons/yr										MT/yr					
Off-Road	7.3600e-003	0.0716	0.0673	1.2000e-004		3.3800e-003	3.3800e-003		3.1600e-003	3.1600e-003	0.0000	10.5433	10.5433	2.6700e-003	0.0	10.6101
<b>Total</b>	<b>7.3600e-003</b>	<b>0.0716</b>	<b>0.0673</b>	<b>1.2000e-004</b>		<b>3.3800e-003</b>	<b>3.3800e-003</b>		<b>3.1600e-003</b>	<b>3.1600e-003</b>	<b>0.0000</b>	<b>10.5433</b>	<b>10.5433</b>	<b>2.6700e-003</b>	<b>0.0</b>	<b>10.6101</b>

**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	N2	CO2e
Category	tons/yr										MT/yr					

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

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	1.6000e-004	2.2100e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5670	0.5670	2.0000e-005	1.0	0.5717
<b>Total</b>	<b>2.1000e-004</b>	<b>1.6000e-004</b>	<b>2.2100e-003</b>	<b>1.0000e-005</b>	<b>7.1000e-004</b>	<b>0.0000</b>	<b>7.2000e-004</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>0.5670</b>	<b>0.5670</b>	<b>2.0000e-005</b>	<b>1.0</b>	<b>0.5717</b>

**3.3 Site Preparation - 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	N2	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.2700e-003	0.0000	6.2700e-003	3.0000e-003	0.0000	3.0000e-003	0.0000	0.0000	0.0000	0.0000	0.0	0.0000
Off-Road	1.1300e-003	0.0124	6.6400e-003	2.0000e-005		5.1000e-004	5.1000e-004		4.7000e-004	4.7000e-004	0.0000	1.5114	1.5114	4.9000e-004	0.0	1.5236
<b>Total</b>	<b>1.1300e-003</b>	<b>0.0124</b>	<b>6.6400e-003</b>	<b>2.0000e-005</b>	<b>6.2700e-003</b>	<b>5.1000e-004</b>	<b>6.7800e-003</b>	<b>3.0000e-003</b>	<b>4.7000e-004</b>	<b>3.4700e-003</b>	<b>0.0000</b>	<b>1.5114</b>	<b>1.5114</b>	<b>4.9000e-004</b>	<b>0.0</b>	<b>1.5236</b>

**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	N2	CO2e
Category	tons/yr										MT/yr					

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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	3.0000e-005	2.0000e-005	2.7000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0698	0.0698	0.0000	0.0000	0.0704
<b>Total</b>	<b>3.0000e-005</b>	<b>2.0000e-005</b>	<b>2.7000e-004</b>	<b>0.0000</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>9.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0698</b>	<b>0.0698</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0704</b>

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	N2	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					6.2700e-003	0.0000	6.2700e-003	3.0000e-003	0.0000	3.0000e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1300e-003	0.0124	6.6400e-003	2.0000e-005		5.1000e-004	5.1000e-004		4.7000e-004	4.7000e-004	0.0000	1.5114	1.5114	4.9000e-004	0.0000	1.5236
<b>Total</b>	<b>1.1300e-003</b>	<b>0.0124</b>	<b>6.6400e-003</b>	<b>2.0000e-005</b>	<b>6.2700e-003</b>	<b>5.1000e-004</b>	<b>6.7800e-003</b>	<b>3.0000e-003</b>	<b>4.7000e-004</b>	<b>3.4700e-003</b>	<b>0.0000</b>	<b>1.5114</b>	<b>1.5114</b>	<b>4.9000e-004</b>	<b>0.0000</b>	<b>1.5236</b>

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	N2	CO2e
Category	tons/yr										MT/yr					

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

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	3.0000e-005	2.0000e-005	2.7000e-004	0.0000	9.0000e-005	0.0000	9.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0698	0.0698	0.0000	0.0000	0.0704
<b>Total</b>	<b>3.0000e-005</b>	<b>2.0000e-005</b>	<b>2.7000e-004</b>	<b>0.0000</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>9.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0698</b>	<b>0.0698</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0704</b>

**3.4 Grading - 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	N2	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0142	0.0000	0.0142	6.8500e-003	0.0000	6.8500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6700e-003	0.0289	0.0174	4.0000e-005		1.2100e-003	1.2100e-003		1.1100e-003	1.1100e-003	0.0000	3.6208	3.6208	1.1700e-003	0.0000	3.6501
<b>Total</b>	<b>2.6700e-003</b>	<b>0.0289</b>	<b>0.0174</b>	<b>4.0000e-005</b>	<b>0.0142</b>	<b>1.2100e-003</b>	<b>0.0154</b>	<b>6.8500e-003</b>	<b>1.1100e-003</b>	<b>7.9600e-003</b>	<b>0.0000</b>	<b>3.6208</b>	<b>3.6208</b>	<b>1.1700e-003</b>	<b>0.0000</b>	<b>3.6501</b>

**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	N2	CO2e
Category	tons/yr										MT/yr					

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

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	6.0000e-005	5.0000e-005	6.8000e-004	0.0000	2.2000e-004	0.0000	2.2000e-004	6.0000e-005	0.0000	6.0000e-005	0.0000	0.1745	0.1745	0.0000	0.0000	0.1759
<b>Total</b>	<b>6.0000e-005</b>	<b>5.0000e-005</b>	<b>6.8000e-004</b>	<b>0.0000</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>2.2000e-004</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>6.0000e-005</b>	<b>0.0000</b>	<b>0.1745</b>	<b>0.1745</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.1759</b>

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	N2	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0142	0.0000	0.0142	6.8500e-003	0.0000	6.8500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.6700e-003	0.0289	0.0174	4.0000e-005		1.2100e-003	1.2100e-003		1.1100e-003	1.1100e-003	0.0000	3.6208	3.6208	1.1700e-003	0.0000	3.6501
<b>Total</b>	<b>2.6700e-003</b>	<b>0.0289</b>	<b>0.0174</b>	<b>4.0000e-005</b>	<b>0.0142</b>	<b>1.2100e-003</b>	<b>0.0154</b>	<b>6.8500e-003</b>	<b>1.1100e-003</b>	<b>7.9600e-003</b>	<b>0.0000</b>	<b>3.6208</b>	<b>3.6208</b>	<b>1.1700e-003</b>	<b>0.0000</b>	<b>3.6501</b>

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	N2	CO2e
Category	tons/yr										MT/yr					

[illegible]



## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Vendor	1.1700e-003	0.0419	0.0157	1.9000e-004	6.5500e-003	2.0000e-004	6.7600e-003	1.8900e-003	1.9000e-004	2.0800e-003	0.0000	18.9095	18.9095	6.3000e-004	2.7	19.7363
Worker	0.0218	0.0173	0.2339	6.5000e-004	0.0752	4.6000e-004	0.0757	0.0200	4.2000e-004	0.0204	0.0000	59.8708	59.8708	1.5900e-003	1.5	60.3751
<b>Total</b>	<b>0.0230</b>	<b>0.0592</b>	<b>0.2496</b>	<b>8.4000e-004</b>	<b>0.0818</b>	<b>6.6000e-004</b>	<b>0.0824</b>	<b>0.0219</b>	<b>6.1000e-004</b>	<b>0.0225</b>	<b>0.0000</b>	<b>78.7803</b>	<b>78.7803</b>	<b>2.2200e-003</b>	<b>4.2</b>	<b>80.1113</b>

**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	N2	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0792	0.6089	0.6558	1.1500e-003		0.0268	0.0268		0.0258	0.0258	0.0000	94.4314	94.4314	0.0160	0.0	94.8323
<b>Total</b>	<b>0.0792</b>	<b>0.6089</b>	<b>0.6558</b>	<b>1.1500e-003</b>		<b>0.0268</b>	<b>0.0268</b>		<b>0.0258</b>	<b>0.0258</b>	<b>0.0000</b>	<b>94.4314</b>	<b>94.4314</b>	<b>0.0160</b>	<b>0.0</b>	<b>94.8323</b>

**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	N2	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	0.0	0.0000
Vendor	1.1700e-003	0.0419	0.0157	1.9000e-004	6.5500e-003	2.0000e-004	6.7600e-003	1.8900e-003	1.9000e-004	2.0800e-003	0.0000	18.9095	18.9095	6.3000e-004	2.7	19.7363

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Worker	0.0218	0.0173	0.2339	6.5000e-004	0.0752	4.6000e-004	0.0757	0.0200	4.2000e-004	0.0204	0.0000	59.8708	59.8708	1.5900e-003	1.5	60.3751
<b>Total</b>	<b>0.0230</b>	<b>0.0592</b>	<b>0.2496</b>	<b>8.4000e-004</b>	<b>0.0818</b>	<b>6.6000e-004</b>	<b>0.0824</b>	<b>0.0219</b>	<b>6.1000e-004</b>	<b>0.0225</b>	<b>0.0000</b>	<b>78.7803</b>	<b>78.7803</b>	<b>2.2200e-003</b>	<b>4.2</b>	<b>80.1113</b>

**3.5 Building Construction - 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	N	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0682	0.5311	0.6008	1.0600e-003		0.0216	0.0216		0.0209	0.0209	0.0000	87.1734	87.1734	0.0145	0.0	87.5363
<b>Total</b>	<b>0.0682</b>	<b>0.5311</b>	<b>0.6008</b>	<b>1.0600e-003</b>		<b>0.0216</b>	<b>0.0216</b>		<b>0.0209</b>	<b>0.0209</b>	<b>0.0000</b>	<b>87.1734</b>	<b>87.1734</b>	<b>0.0145</b>	<b>0.0</b>	<b>87.5363</b>

**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	N	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	0.0	0.0000
Vendor	1.0500e-003	0.0388	0.0142	1.8000e-004	6.0500e-003	1.9000e-004	6.2400e-003	1.7500e-003	1.8000e-004	1.9300e-003	0.0000	17.1931	17.1931	5.9000e-004	2.4	17.9458
Worker	0.0188	0.0142	0.2007	5.9000e-004	0.0694	4.1000e-004	0.0698	0.0184	3.8000e-004	0.0188	0.0000	53.7028	53.7028	1.3300e-003	1.3	54.1345

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

## EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Total	0.0198	0.0530	0.2149	7.7000e-004	0.0755	6.0000e-004	0.0761	0.0202	5.6000e-004	0.0208	0.0000	70.8958	70.8958	1.9200e-003	3.8	72.0803
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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	N2	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0682	0.5311	0.6008	1.0600e-003		0.0216	0.0216		0.0209	0.0209	0.0000	87.1733	87.1733	0.0145	0.0	87.5362
Total	0.0682	0.5311	0.6008	1.0600e-003		0.0216	0.0216		0.0209	0.0209	0.0000	87.1733	87.1733	0.0145	0.0	87.5362

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	N2	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	0.0	0.0000
Vendor	1.0500e-003	0.0388	0.0142	1.8000e-004	6.0500e-003	1.9000e-004	6.2400e-003	1.7500e-003	1.8000e-004	1.9300e-003	0.0000	17.1931	17.1931	5.9000e-004	2.4	17.9458
Worker	0.0188	0.0142	0.2007	5.9000e-004	0.0694	4.1000e-004	0.0698	0.0184	3.8000e-004	0.0188	0.0000	53.7028	53.7028	1.3300e-003	1.3	54.1345
Total	0.0198	0.0530	0.2149	7.7000e-004	0.0755	6.0000e-004	0.0761	0.0202	5.6000e-004	0.0208	0.0000	70.8958	70.8958	1.9200e-003	3.8	72.0803

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****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	N 2	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.0900e-003	0.0293	0.0441	7.0000e-005		1.4100e-003	1.4100e-003		1.3000e-003	1.3000e-003	0.0000	5.8870	5.8870	1.8700e-003	0.0	5.9337
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000
<b>Total</b>	<b>3.0900e-003</b>	<b>0.0293</b>	<b>0.0441</b>	<b>7.0000e-005</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>		<b>1.3000e-003</b>	<b>1.3000e-003</b>	<b>0.0000</b>	<b>5.8870</b>	<b>5.8870</b>	<b>1.8700e-003</b>	<b>0.0</b>	<b>5.9337</b>

**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	N 2	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	0.0	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	0.0	0.0000
Worker	1.9000e-004	1.5000e-004	2.0600e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5509	0.5509	1.0000e-005	1.0	0.5554
<b>Total</b>	<b>1.9000e-004</b>	<b>1.5000e-004</b>	<b>2.0600e-003</b>	<b>1.0000e-005</b>	<b>7.1000e-004</b>	<b>0.0000</b>	<b>7.2000e-004</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>0.5509</b>	<b>0.5509</b>	<b>1.0000e-005</b>	<b>1.0</b>	<b>0.5554</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**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	N 2	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.0900e-003	0.0293	0.0441	7.0000e-005		1.4100e-003	1.4100e-003		1.3000e-003	1.3000e-003	0.0000	5.8870	5.8870	1.8700e-003	0.0	5.9337
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000
<b>Total</b>	<b>3.0900e-003</b>	<b>0.0293</b>	<b>0.0441</b>	<b>7.0000e-005</b>		<b>1.4100e-003</b>	<b>1.4100e-003</b>		<b>1.3000e-003</b>	<b>1.3000e-003</b>	<b>0.0000</b>	<b>5.8870</b>	<b>5.8870</b>	<b>1.8700e-003</b>	<b>0.0</b>	<b>5.9337</b>

**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	N 2	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	0.0	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	0.0	0.0000
Worker	1.9000e-004	1.5000e-004	2.0600e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5509	0.5509	1.0000e-005	1.0	0.5554
<b>Total</b>	<b>1.9000e-004</b>	<b>1.5000e-004</b>	<b>2.0600e-003</b>	<b>1.0000e-005</b>	<b>7.1000e-004</b>	<b>0.0000</b>	<b>7.2000e-004</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>1.9000e-004</b>	<b>0.0000</b>	<b>0.5509</b>	<b>0.5509</b>	<b>1.0000e-005</b>	<b>1.0</b>	<b>0.5554</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****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	N2	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.6817					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.0000e-004	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0000	1.2784
<b>Total</b>	<b>0.6826</b>	<b>6.0900e-003</b>	<b>9.0500e-003</b>	<b>1.0000e-005</b>		<b>3.0000e-004</b>	<b>3.0000e-004</b>		<b>3.0000e-004</b>	<b>3.0000e-004</b>	<b>0.0000</b>	<b>1.2766</b>	<b>1.2766</b>	<b>7.0000e-005</b>	<b>0.0000</b>	<b>1.2784</b>

**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	N2	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	3.8000e-004	2.9000e-004	4.1200e-003	1.0000e-005	1.4200e-003	1.0000e-005	1.4300e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.1019	1.1019	3.0000e-005	3.0000	1.1107
<b>Total</b>	<b>3.8000e-004</b>	<b>2.9000e-004</b>	<b>4.1200e-003</b>	<b>1.0000e-005</b>	<b>1.4200e-003</b>	<b>1.0000e-005</b>	<b>1.4300e-003</b>	<b>3.8000e-004</b>	<b>1.0000e-005</b>	<b>3.9000e-004</b>	<b>0.0000</b>	<b>1.1019</b>	<b>1.1019</b>	<b>3.0000e-005</b>	<b>3.0000</b>	<b>1.1107</b>

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**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**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	N 2	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.6817					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0	0.0000
Off-Road	9.0000e-004	6.0900e-003	9.0500e-003	1.0000e-005		3.0000e-004	3.0000e-004		3.0000e-004	3.0000e-004	0.0000	1.2766	1.2766	7.0000e-005	0.0	1.2784
<b>Total</b>	<b>0.6826</b>	<b>6.0900e-003</b>	<b>9.0500e-003</b>	<b>1.0000e-005</b>		<b>3.0000e-004</b>	<b>3.0000e-004</b>		<b>3.0000e-004</b>	<b>3.0000e-004</b>	<b>0.0000</b>	<b>1.2766</b>	<b>1.2766</b>	<b>7.0000e-005</b>	<b>0.0</b>	<b>1.2784</b>

**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	N 2	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	0.0	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	0.0	0.0000
Worker	3.8000e-004	2.9000e-004	4.1200e-003	1.0000e-005	1.4200e-003	1.0000e-005	1.4300e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.1019	1.1019	3.0000e-005	3.0	1.1107
<b>Total</b>	<b>3.8000e-004</b>	<b>2.9000e-004</b>	<b>4.1200e-003</b>	<b>1.0000e-005</b>	<b>1.4200e-003</b>	<b>1.0000e-005</b>	<b>1.4300e-003</b>	<b>3.8000e-004</b>	<b>1.0000e-005</b>	<b>3.9000e-004</b>	<b>0.0000</b>	<b>1.1019</b>	<b>1.1019</b>	<b>3.0000e-005</b>	<b>3.0</b>	<b>1.1107</b>

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****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	N2 O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4899	0.5520	5.0561	0.0112	1.2217	8.1400e-003	1.2299	0.3260	7.5600e-003	0.3335	0.0000	1,033.8228	1,033.8228	0.0709	0.0	1,048.9185
Unmitigated	0.4899	0.5520	5.0561	0.0112	1.2217	8.1400e-003	1.2299	0.3260	7.5600e-003	0.3335	0.0000	1,033.8228	1,033.8228	0.0709	0.0	1,048.9185

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	1,000.96	903.44	752.56	3,251,567	3,251,567
Total	1,000.96	903.44	752.56	3,251,567	3,251,567

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	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 Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

**4.4 Fleet Mix**



## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.540171	0.064547	0.189075	0.126673	0.023412	0.006384	0.010926	0.008089	0.000929	0.000597	0.0251	0.000706	0.00

**5.0 Energy Detail**

Historical Energy Use: N

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N 2	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	222.3798	222.3798	0.0106	1.29	223.0280
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	222.3798	222.3798	0.0106	1.29	223.0280
NaturalGas Mitigated	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	105.6264	105.6264	2.0200e-003	1.94	106.2541
NaturalGas Unmitigated	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	105.6264	105.6264	2.0200e-003	1.94	106.2541

**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	CH 4	N2O	CO2e
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## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Mid Rise	1.97936e+06	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	105.6264	105.6264	2.0	1.9400e-003	106.2541
<b>Total</b>		<b>0.0107</b>	<b>0.0912</b>	<b>0.0388</b>	<b>5.8000e-004</b>		<b>7.3700e-003</b>	<b>7.3700e-003</b>		<b>7.3700e-003</b>	<b>7.3700e-003</b>	<b>0.0000</b>	<b>105.6264</b>	<b>105.6264</b>	<b>2.0</b>	<b>1.9400e-003</b>	<b>106.2541</b>

**Mitigated**

	Natural Gas 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 Mid Rise	1.97936e+06	0.0107	0.0912	0.0388	5.8000e-004		7.3700e-003	7.3700e-003		7.3700e-003	7.3700e-003	0.0000	105.6264	105.6264	2.0	1.9400e-003	106.2541
<b>Total</b>		<b>0.0107</b>	<b>0.0912</b>	<b>0.0388</b>	<b>5.8000e-004</b>		<b>7.3700e-003</b>	<b>7.3700e-003</b>		<b>7.3700e-003</b>	<b>7.3700e-003</b>	<b>0.0000</b>	<b>105.6264</b>	<b>105.6264</b>	<b>2.0</b>	<b>1.9400e-003</b>	<b>106.2541</b>

**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	708494	222.3798	0.0106	1.2900e-003	223.0280

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Total		222.3798	0.0106	1.2900e-003	223.0280
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**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Mid Rise	708494	222.3798	0.0106	1.2900e-003	223.0280
Total		222.3798	0.0106	1.2900e-003	223.0280

**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	N	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5151	0.0696	3.0654	3.0800e-003		0.1862	0.1862		0.1862	0.1862	19.5443	40.6570	60.2013	0.0613	1.3	62.1280



## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Consumer Products	0.7873					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.6027	0.0477	1.1697	2.9800e-003		0.1757	0.1757		0.1757	0.1757	19.5443	37.5575	57.1018	0.0583	1.589542
Landscaping	0.0569	0.0218	1.8957	1.0000e-004		0.0105	0.0105		0.0105	0.0105	0.0000	3.0996	3.0996	2.9700e-003	0.31738
<b>Total</b>	<b>1.5151</b>	<b>0.0696</b>	<b>3.0654</b>	<b>3.0800e-003</b>		<b>0.1862</b>	<b>0.1862</b>		<b>0.1862</b>	<b>0.1862</b>	<b>19.5443</b>	<b>40.6570</b>	<b>60.2013</b>	<b>0.0613</b>	<b>1.621280</b>

**7.0 Water Detail****7.1 Mitigation Measures Water**

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	79.1552	0.3942	9.6600e-003	91.8895
Unmitigated	79.1552	0.3942	9.6600e-003	91.8895

**7.2 Water by Land Use****Unmitigated**

Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
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## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

Land Use	Mgal	MT/yr			
Apartments Mid Rise	11.9883 / 7.55787	79.1552	0.3942	9.6600e-003	91.8895
<b>Total</b>		<b>79.1552</b>	<b>0.3942</b>	<b>9.6600e-003</b>	<b>91.8895</b>

**Mitigated**

Indoor/Outdoor Use		Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Mid Rise	11.9883 / 7.55787	79.1552	0.3942	9.6600e-003	91.8895
<b>Total</b>		<b>79.1552</b>	<b>0.3942</b>	<b>9.6600e-003</b>	<b>91.8895</b>

**8.0 Waste Detail****8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
--	-----------	-----	-----	------

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

	MT/yr			
Mitigated	17.1812	1.0154	0.0000	42.5656
Unmitigated	17.1812	1.0154	0.0000	42.5656

**8.2 Waste by Land Use****Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	84.64	17.1812	1.0154	0.0000	42.5656
<b>Total</b>		<b>17.1812</b>	<b>1.0154</b>	<b>0.0000</b>	<b>42.5656</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Mid Rise	84.64	17.1812	1.0154	0.0000	42.5656
<b>Total</b>		<b>17.1812</b>	<b>1.0154</b>	<b>0.0000</b>	<b>42.5656</b>

## Mission and Lincoln Apartments - Los Angeles-South Coast County, Annual

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied****9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

**10.0 Stationary Equipment**

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**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

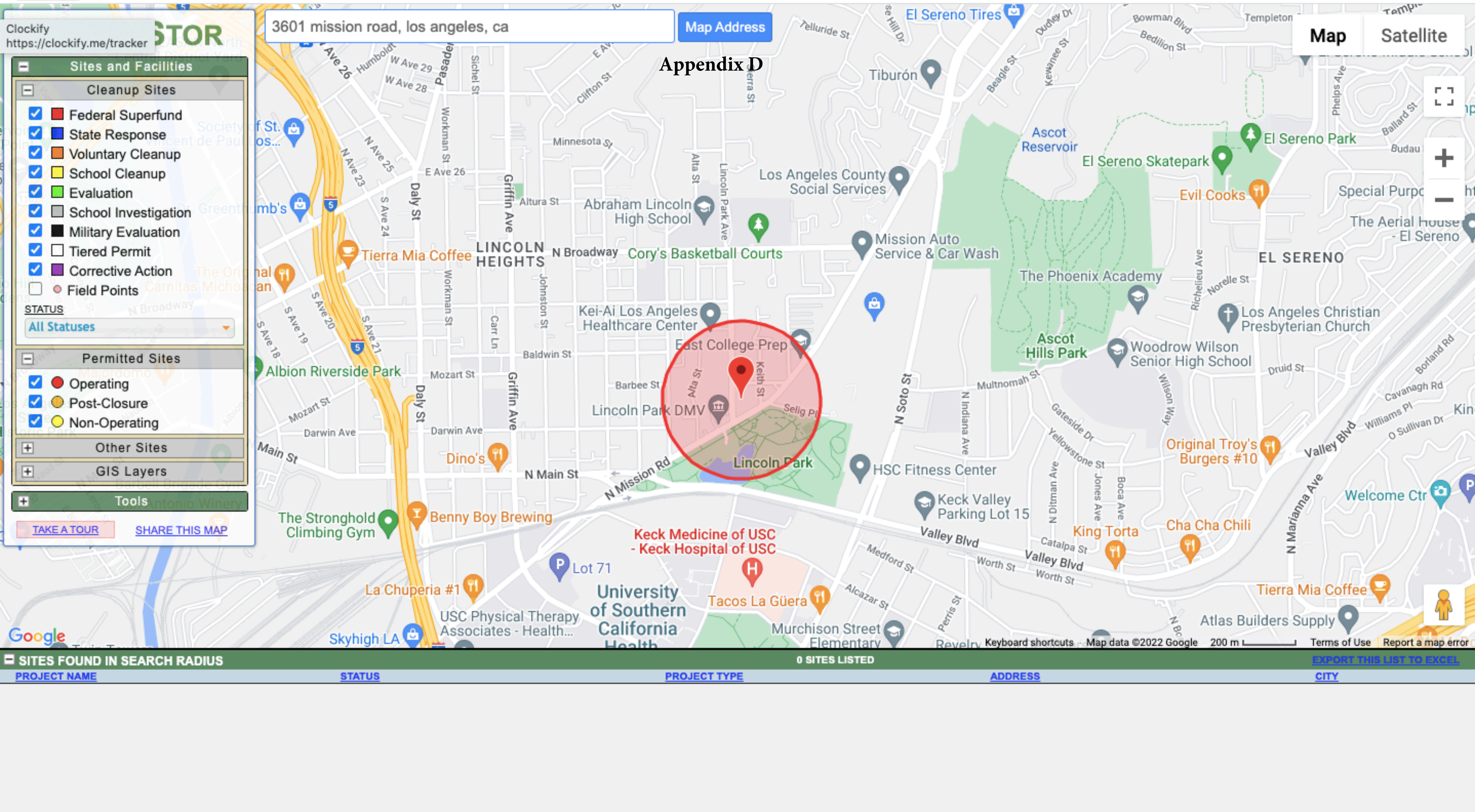
**User Defined Equipment**

Equipment Type	Number
----------------	--------

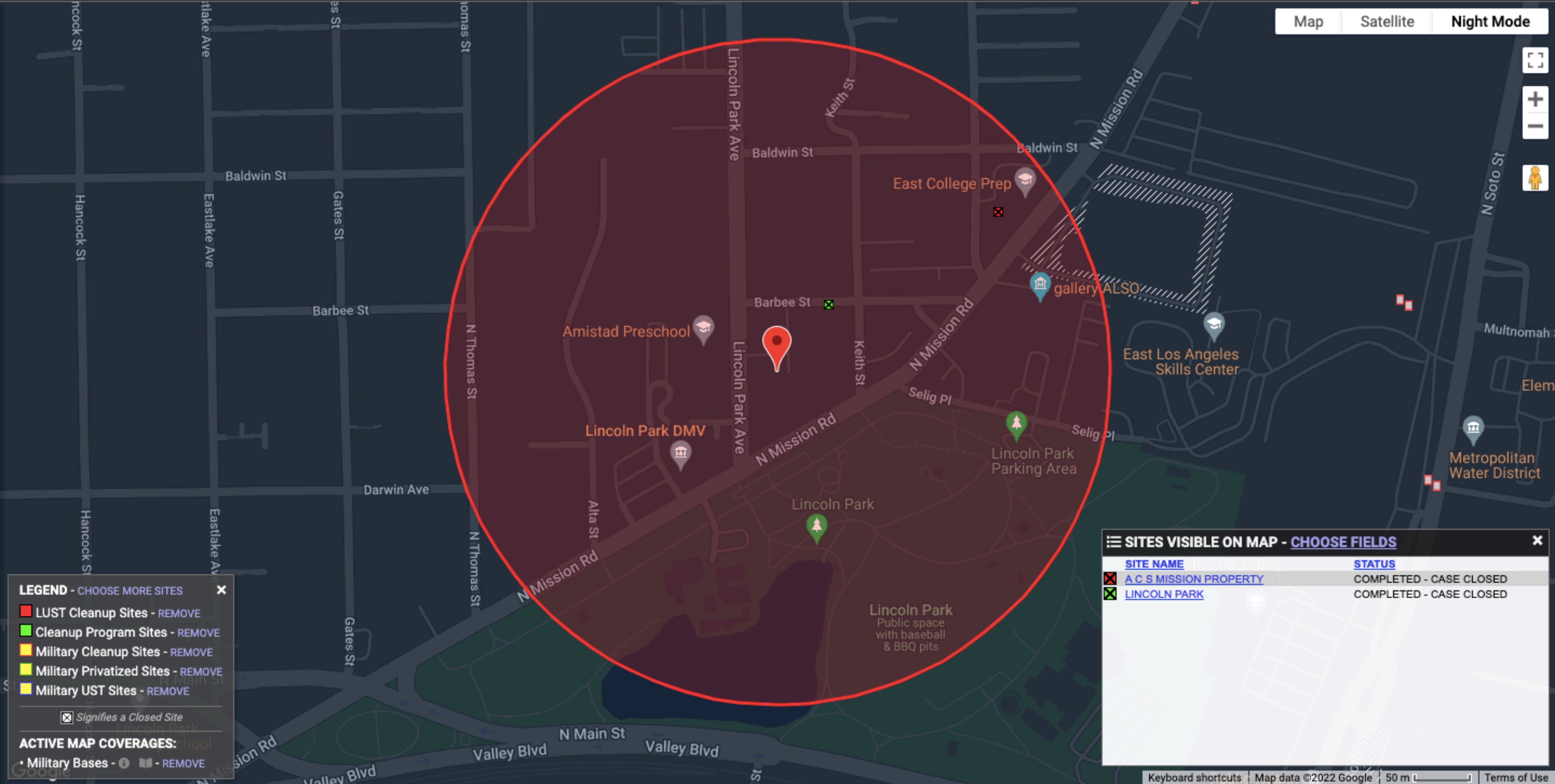
**11.0 Vegetation**

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LEGEND - CHOOSE MORE SITES

LUST Cleanup Sites - REMOVE

Cleanup Program Sites - REMOVE

Military Cleanup Sites - REMOVE

Military Privatized Sites - REMOVE

Military UST Sites - REMOVE

Signifies a Closed Site

ACTIVE MAP COVERAGES:

Military Bases -  - REMOVE

SITES VISIBLE ON MAP - CHOOSE FIELDS

SITE NAME	STATUS
<div><div></div>A C S MISSION PROPERTY</div>	COMPLETED - CASE CLOSED
<div><div></div>LINCOLN PARK</div>	COMPLETED - CASE CLOSED

# Exhibit B



Shay Yadin &lt;sy@brennercapital.com&gt;

---

**3601 Mission Rd - Updated Protected Tree Report**

5 messages

**Jesi Harris** <harrislanduse@gmail.com>

Tue, Sep 13, 2022 at 6:02 PM

To: Albert Vera &lt;albert.e.vera@lacity.org&gt;, bryan.ramirez@lacity.org, Urban Forestry Division &lt;bss.urbanforestry@lacity.org&gt;, miguel.ornelas@lacity.org, richard.a.sanchez@lacity.org

Cc: Shay Yadin &lt;sy@brennercapital.com&gt;, Stephanie Reed &lt;stephanie@upla.studio&gt;, Brian Silveira &lt;silveira.brian@gmail.com&gt;, Mark Lahmon &lt;mlahmon@lahmonarch.com&gt;, Jenny Cabal &lt;jcabal@lahmonarch.com&gt;, Keith Boggero &lt;kboggero@lahmonarch.com&gt;, Jake Patton &lt;j.patton@ksa-la.com&gt;

Hi, UFD Team,

The property owner was able to locate clear evidence that the Western Sycamore trees were planted by the previous owner of the site in the year 2000 and, as such, are not considered protected trees. That evidence is reflected in the updated Protected Tree Report, which is attached to this email, and includes:

1. The demolition plan from 1989 showing that there were buildings at the exact location of the Sycamores. In other words, the trees could not have existed there before that time.
2. Site photos taken by Cri-Help in July 1999, before they renovated the site, clearly showing that the yard area in question did not have the sycamores at that time.
3. Cri-Help's Landscaping plans from July 7, 2000. This was a part of the renovation drawings set when Cri-Help converted the entire site for their use - which clearly indicate that they planted nine, 15-gallon CA Sycamores in the exact location the existing Sycamores are located.

Please let me know once you've reviewed these items and can confirm that the Western Sycamore trees that currently occur on the project site are not considered protected trees.

Best,

Jesi

--

Jesi Harris

Planning Project Manager, Brian Silveira &amp; Associates

704.277.7332

**PTR-Mission-UPDATED09.13.22.pdf**

10085K

**Albert Vera** <albert.e.vera@lacity.org>

Wed, Sep 14, 2022 at 6:46 AM

To: Jesi Harris &lt;harrislanduse@gmail.com&gt;

Cc: bryan.ramirez@lacity.org, Urban Forestry Division &lt;bss.urbanforestry@lacity.org&gt;, miguel.ornelas@lacity.org, richard.a.sanchez@lacity.org, Shay Yadin &lt;sy@brennercapital.com&gt;, Stephanie Reed &lt;stephanie@upla.studio&gt;, Brian Silveira &lt;silveira.brian@gmail.com&gt;, Mark Lahmon &lt;mlahmon@lahmonarch.com&gt;, Jenny Cabal &lt;jcabal@lahmonarch.com&gt;, Keith Boggero &lt;kboggero@lahmonarch.com&gt;, Jake Patton &lt;j.patton@ksa-la.com&gt;

Good morning Jesi,

Thank you for the information. I will review the report and get back to you shortly.

Please contact me if you have any questions or concerns regarding this subject.

Albert Vera, **Regular Day off Monday's**

Tree Surgeon Supervisor 2

Urban Forestry Division

[1149 S Broadway 4th Floor, Los Angeles, CA 90015](#)

O: (213) 847-3117 , MS 550



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Call Service Request (800) 996-2489 or contact [bss.boss@lacity.org](mailto:bss.boss@lacity.org)

Or Dial 3-1-1 or download the MyLA311 mobile app

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**Albert Vera** <[albert.e.vera@lacity.org](mailto:albert.e.vera@lacity.org)>

Fri, Sep 16, 2022 at 11:27 AM

To: Jesi Harris <[harrislanduse@gmail.com](mailto:harrislanduse@gmail.com)>

Cc: bryan.ramirez@lacity.org, Urban Forestry Division <[bss.urbanforestry@lacity.org](mailto:bss.urbanforestry@lacity.org)>, miguel.ornelas@lacity.org, richard.a.sanchez@lacity.org, Shay Yadin <[sy@brennercapital.com](mailto:sy@brennercapital.com)>, Stephanie Reed <[stephanie@upla.studio](mailto:stephanie@upla.studio)>, Brian Silveira <[silveira.brian@gmail.com](mailto:silveira.brian@gmail.com)>, Mark Lahmon <[mlahmon@lahmonarch.com](mailto:mlahmon@lahmonarch.com)>, Jenny Cabal <[jcabal@lahmonarch.com](mailto:jcabal@lahmonarch.com)>, Keith Boggero <[kboggero@lahmonarch.com](mailto:kboggero@lahmonarch.com)>, Jake Patton <[j.patton@ksa-la.com](mailto:j.patton@ksa-la.com)>

Good morning Jesi,

I have reviewed and discussed the information with management and it has been determined that the trees do not qualify as protected and therefore no approval is needed by UFD or the Board of Public w\Works. The comments on the system are as follows: Upon inspection and after reviewing the information and discussing the trees with the arborist, the inspector agrees that trees qualify as not protected. Ordinance 186873 Sec 46.01 states that This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

The removal request will be closed out.

Please contact me if you have any questions or concerns regarding this subject.

Albert Vera, **Regular Day off Monday's**

Tree Surgeon Supervisor 2

Urban Forestry Division

[1149 S Broadway 4th Floor, Los Angeles, CA 90015](#)

O: (213) 847-3117 , MS 550



**\*NEW\***

The Urban Forestry Division has a new online Customer Service Request (CSR) application which is designed to receive all inquiries and requests related to

clearances for Dept. of City Planning and LADBS building permits. You will be able to request for our office review for your clearances by logging into your Angeleno Account at [angeleno.lacity.org](https://angeleno.lacity.org). Select Bureau of Engineering Customer Service Portal. Select Customer Service Request. Select Online Service Available and select New Request. Be sure to select Streets LA as the agency and Urban Forestry Division as the office/location.

**Note:**

The normal response time for CSR requests is one to three days, with a maximum of about a week during unusual periods. Requests are taken in the order received and are closely monitored to ensure that all requests will be responded to in a timely manner. You will be notified by email when there is a response and can log in at any time to check the status. In order to serve you better, requests and questions will no longer be accepted via the [bss.urbanforestry@lacity.org](mailto:bss.urbanforestry@lacity.org) email.

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**Jesi Harris** <[harrislanduse@gmail.com](mailto:harrislanduse@gmail.com)>

Fri, Sep 16, 2022 at 12:13 PM

To: Albert Vera <[albert.e.vera@lacity.org](mailto:albert.e.vera@lacity.org)>

Cc: Brian Silveira <[silveira.brian@gmail.com](mailto:silveira.brian@gmail.com)>, Jake Patton <[j.patton@ksa-la.com](mailto:j.patton@ksa-la.com)>, Jenny Cabal <[jcabal@lahmonarch.com](mailto:jcabal@lahmonarch.com)>, Keith Boggero <[kboggero@lahmonarch.com](mailto:kboggero@lahmonarch.com)>, Mark Lahmon <[mlahmon@lahmonarch.com](mailto:mlahmon@lahmonarch.com)>, Shay Yadin <[sy@brennercapital.com](mailto:sy@brennercapital.com)>, Stephanie Reed <[stephanie@upla.studio](mailto:stephanie@upla.studio)>, Urban Forestry Division <[bss.urbanforestry@lacity.org](mailto:bss.urbanforestry@lacity.org)>, bryan.ramirez@lacity.org, miguel.ornelas@lacity.org, richard.a.sanchez@lacity.org

Thank you for confirming, Albert.

Jesi

[Quoted text hidden]

---

**Jake Patton** <[j.patton@ksa-la.com](mailto:j.patton@ksa-la.com)>

Mon, Sep 19, 2022 at 3:07 PM

To: Shay Yadin <[sy@brennercapital.com](mailto:sy@brennercapital.com)>

Cc: Mark Lahmon <[mlahmon@lahmonarch.com](mailto:mlahmon@lahmonarch.com)>

Great job team.

Best,

**JAKE PATTON** | PRINCIPAL

**KSA** | LANDSCAPE DESIGN STUDIO

6150 Washington Boulevard, Arts District, Culver City, CA 90232

T: 310-574-4460 x 232

D: 310-876-1032

[j.patton@ksa-la.com](mailto:j.patton@ksa-la.com)  
[www.ksa-la.com](http://www.ksa-la.com)

Please print responsibly. [In response to COVID-19, KSA has shifted all employees to remote workstations and remains fully operational.](#)

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1. The demolition plan from 1989 showing that there were buildings at the exact location of the Sycamores. In other words, the trees could not have existed there before that time.
2. Site photos taken by Cri-Help in July 1999, **before** they renovated the site, clearly showing that the yard area in question did not have the sycamores at that time.
3. Cri-Help's Landscaping plans from July 7, 2000. This was a part of the renovation drawings set when Cri-Help converted the entire site for their use - which clearly indicate that they planted nine, 15-gallon CA Sycamores in the exact location the existing Sycamores are located.

Please let me know once you've reviewed these items and can confirm that the Western Sycamore trees that currently occur on the project site are not considered protected trees.

Best,

Jesi

--

Jesi Harris

Planning Project Manager, Brian Silveira & Associates

704.277.7332

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# Exhibit C



December 29, 2023

Lincoln Park Holdings, LLC  
100 S Citrus Ave  
Los Angeles, CA 90036

**RE: Biologist's Statement of Biological Resources Letter for 3601 North Mission Road in Los Angeles, California**

Dear Shay:

This letter includes an assessment of the potential for protected biological resources to occur on 3601 North Mission Road in the City of Los Angeles, California (APN: 521-100-9015) for a proposed development on the parcel. The parcel is within the City of Los Angeles, and the city planner requested an experienced biologist conduct a site visit and complete the *Biologist's Statement of Biological Resources* form (see Attachment A). The form asks if the project site contains one or more of the following protected biological resources:

- Water resources, including but not limited to, streams, wetlands, or other permanent/seasonal water bodies. The National Wetlands Inventory<sup>1</sup> (NWI) and National Hydrography Dataset<sup>2</sup> (NHD) were consulting for this assessment.
- Protected Trees and/or Shrubs (those protected by the City of Los Angeles Municipal Code as indicated in the City of Los Angeles Tree/Shrub Ordinance). Species protected include valley oak (*Quercus lobata*), coast live oak (*Quercus agrifolia*), or any other tree of the oak genus Indigenous to southern California excluding the scrub oak (*Quercus berberidifolia*), southern California black walnut (*Juglans californica*), western sycamore (*Platanus racemosa*), California bay (*Umbellularia californica*), Mexican elderberry (*Sambucus mexicana*), and toyon (*Heteromeles arbutifolia*). Trees of these species are protected that measure four inches or more in diameter, 4 feet 6 inches above the ground level at the base of the plant.
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database<sup>3</sup> (CNDDB) records of sensitive species, such as mountain lions, within a 0.25-mile radius of the project site.

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<sup>1</sup> United States Fish and Wildlife Service (USFWS). 2023. National Wetlands Inventory Online Wetlands Mapper. Accessed online: <https://www.fws.gov/wetlands/data/mapper.html>

<sup>2</sup> United States Geological Service (USGS). 2023. National Hydrography Dataset (NHD) The National Map Viewer. Accessed online: <https://viewer.nationalmap.gov/services/>

## Site Conditions

South Environmental Biologist Dana Briggs conducted a site visit of the property in the morning of Tuesday October 31, 2023. The property is set within the suburban community of Lincoln Heights and is surrounded by existing homes, roads, and a public park. The property is currently developed with an asphalt parking lot and disturbed ornamental landscaping throughout the 7,009.2-ft<sup>2</sup> parcel.

The vegetation throughout the parcel is primarily disturbed ornamental trees with little-no understory due to disturbance from landscaping, asphalt substrate, soil compaction, and invasive species. There is a wall spanning the perimeter covered with creeping fig (*Ficus pumila*) and lined with sparse ornamental vegetation such as China rose (*Rosa chinensis*), century plant (*Agave americana*, native), and prickly pear (*Opuntia ficus-indica*). There are mature trees throughout the parcel in both the asphalt parking lot in the northern section and the bare dirt section in the southern region including Brazilian peppertree (*Schinus terebinthifolia*), crepe myrtle (*Lagerstroemia indica*), sweetgum (*Liquidambar styraciflua*), tropical ash (*Fraxinus uhdei*), blue jacaranda (*Jacaranda mimosifolia*), black locust (*Robinia pseudoacacia*), European fan palm (*Chamaerops humilis*), stone pine (*Pinus pinea*), Canary Island pine (*Pinus canariensis*), and western sycamore (*Platanus racemosa*).

Although there are five mature western sycamore trees throughout the parcel, these trees would not be protected under the Los Angeles Protected Tree/ Shrub Ordinance because they were planted with landscaping from a nursery and are not naturally occurring, as described in the project's arborist report in Attachment C. Not only is the community not naturally occurring, but it is also dominated in the canopy by non-native species. Based on the relative canopy cover on the parcel, less than 30% of the relative canopy cover is western sycamore and therefore this is not considered a California Sycamore - Coast Live Oak Riparian Woodland Alliance as defined by the California Native Plant Society (CNPS) Manual of California Vegetation Online membership rules. Additionally, the understory is either non-existent or sparse due to compaction and cannot support sensitive species. There is almost no understory vegetation in the parking lot due to the asphalt substrate, and the dirt understory in the southern region contains ruderal non-native/ invasive grasses and sparse ornamentals such as bristly oxtongue (*Helminthotheca echioides*), Bermuda grass (*Cynodon dactylon*), bitter orange (*Citrus x aurantium*), aloe vera (*Aloe vera*), and bay laurel (*Laurus nobilis*).

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<sup>3</sup> California Department of Fish and Wildlife (CDFW). 2023. California Natural Diversity Database (CNDDB) (available by subscription) and Rarefind. Sacramento, California. Accessed online: [California Natural Diversity Database](#)

No water resources were found on site in the NWI or NHD during the literature search, and none were observed on the parcel during the site visit.

Wildlife observed on the parcel during the site visit by South Environmental included Cooper's hawk (*Accipiter cooperii*), house finch (*Haemorhous mexicanus*), yellow-rumped warbler (*Setophaga coronata*), ruby-crowned kinglet (*Corthylio calendula*), lesser goldfinch (*Spinus psaltria*), red-breasted nuthatch (*Sitta canadensis*), and fox squirrel (*Sciurus niger*, non-native). According to CDFW and CNDDDB records, there are records of two sensitive species within 0.25 miles in which the parcel is located: bank swallow (*Riparia riparia*) and burrowing owl (*Athene cunicularia*). Bank swallows dwell in riparian habitats with banks for nesting in colonies and open water for feeding. Burrowing owls are found in deserts, grasslands, and open fields with rodents available for food. No sensitive species, including bank swallow and burrowing owl, are expected to occur on the parcel due to the lack of native habitat and the high level of disturbance resulting from development and ornamental landscaping.

The potential for roosting bats was also assessed for the site. The site lacks typical roosting spots such as dense palm trees, dead trees with hollows, or snags and openings in damaged trees. The site is also set within a heavily settled area with a high human presence, and bats would avoid roosting near due to the proximity to humans. Hearing their calls near the site does not conclude that the site contains suitable bat habitat. Finally, the site lacks a water source that would be required for roosting bats to occur. The lake, trees, and open space with less human presence at the adjacent Lincoln Park creates suitable habitat for bat species, but this area will not be impacted by project activities. For these reasons, the site is not an adequate habitat for bats (including special-status bats).

#### Response to Public Comments

**Comments from public state the site has "Value as Habitat for Endangered Rare or Threatened Species". Evidence provided includes a list of wildlife observed near the project site that includes special status species.**

**Response:** Based on the survey and results presented in this report by South Environmental, the project site lacks native habitat. The development area contains asphalt substrate and dirt groundcover with sparse ornamental landscaping and ruderal invasive plants that are found in areas of high disturbance. Special-status species rely on native habitat for foraging and nesting and as a result, no special-status species are expected to be able to survive on the site due to lack of native habitat and level of disturbance and development. The trees on the site, including the western sycamore trees, are not naturally occurring habitat but are landscaped species that lack the typical habitat dynamics of a native plant community where special-status species

would occur. The sycamore trees make up less than 30% of the total canopy cover on the parcel and the community does not meet the membership criteria that defines the native sycamore woodlands due to the dominance of ornamental and non-native trees. In addition, these trees are not naturally occurring and were landscaped and determined not to be protected under the Los Angeles Protected Tree/ Shrub Ordinance.

Specifically, the letter states that four special-status species were observed by a wildlife biologist during a survey conducted on October 27, 2023, in the vicinity of the project: monarch butterfly (*Danaus plexippus plexippus* pop. 1, California overwintering population), California gull (*Larus californicus*), double-crested cormorant (*Nannopterum auritum*), and Cooper's hawk (*Accipiter cooperii*). The letter states that other species occurs but the remaining 34 species observed do not occur on the CDFW Special Animals List (last updated October 2023) and would not be considered special status as a result despite some of them being listed with a special status. Specifically, birds with the status of BOP (Birds of Prey, California Fish and Game Code 3503.5) or BCC (Bird of Conservation Concern, U.S. Fish and Wildlife Service) are not considered special-status species as described in the report from October 27, 2023. It should be noted that ruderal and landscaped vegetation is not habitat for any special-status species, including those listed, because they use native habitats. In addition, CDFW does not protect ruderal vegetation because it is a byproduct of disturbance and development of native habitats. To suggest that ruderal areas with high disturbance is habitat for special-status species because species were observed flying over or in an adjacent park is not correct. Ruderal vegetation does not provide foraging or cover site that would be required for these species to persist on the site, and they could only perch on landscaped trees at the edge or fly over.

The following is an assessment of the four special-status species observed by the biologist.

- Monarch butterfly (Federal candidate species) is a species often observed flying through suburban neighborhoods and was observed in Lincoln Park, but not on the project site. The project site has landscaping and ruderal vegetation that is not the overwintering habitat that the species requires for survival. CDFW protects overwintering habitat such as stands of wind-protected eucalyptus trees within one mile of the ocean. The project site is not coastal and does not contain coastal overwintering habitat. Ruderal plants such as those on the project site also do not include the foraging species that support the monarch during breeding such as milkweed. Therefore, there is no habitat on the site for monarch butterflies, and observing a single butterfly in the park adjacent to the site does not indicate that the project site is an essential habitat for the species. The site lacks all of the necessary habitat characteristics to support this species during its life cycle.

- California gulls (CDFW watchlist species) were observed flying over the site and not using the site. There is nothing on the site that would attract California gulls as the breeding habitat for this species includes vegetated islands and levees in inland lakes and rivers, which would include Lincoln Park but not the project site itself. In addition, these are opportunistic foragers that can find food at garbage dumps, scrublands, pastures, orchards, meadows, and farms. However, ruderal disturbed areas are not foraging habitat and the project site lacks any habitat for this species.
- Double-crested cormorants (CDFW watchlist species) were observed flying over the project site. Cormorants are pelagic species that are found near aquatic bodies with an ample supply of fish and perching areas, such as coastal regions, lagoons, and ponds. The project site does not have any bodies of water for feeding and only contains landscaped trees, which are not considered habitat. It is possible that these cormorants were stopping in Lincoln Park, which contains an ample water body and surrounding trees that could support double-crested cormorants. However, this project would not have an impact on this park, and the observation of this bird flying over the project site does not indicate that the site is an essential habitat for this species. No nests of this species were observed on the project site.
- Cooper's hawk (CDFW watchlist species) is a small raptor that is often found in suburban areas and is a common predator of birds on home feeders. Typical habitat is riparian woodlands and forests. The project site does have trees that this bird was observed perching on during the South Environmental survey on October 31, 2023, but these are landscaped trees and not the preferred nesting habitat. Ornamental landscape trees on the site are not essential for the species to persist in the area. Landscaping is not considered habitat and ruderal ground cover provides no habitat or benefit for Cooper's hawk. The observation of this bird flying over the project site does not indicate that the site is an essential habitat for this species.

The suggestion that the project would result in loss of habitat for special status species is false. The loss of landscaped trees and a ruderal and disturbed understory would not be considered significant loss of habitat for the reasons stated above. In addition, the arborist report notes the project's proposed plant palette includes the addition of four new western sycamore trees, as well as several other native tree, shrub, and groundcover species such as Catalina cherry (*Prunus ilicifolia* ssp. *lyonii*), California coffeeberry (*Frangula californica*), beach wormwood (*Artemisia pycnocephala*), creeping sage (*Salvia sonomensis*), California grey rush (*Juncus patens*), California field sedge (*Carex praegacilis*), gooseberry (*Ribes speciosum*), hummingbird sage (*Salvia spathacea*), deergrass (*Muhlenbergia rigens*), frogfruit (*Phyla nodiflora*), giant wildrye (*Leymus condensatus*), island snapdragon (*Galvezia speciosa*), California wild rose (*Rosa*

*californica*), woolly bluecurls (*Trichostema lanatum*), gracias sage (*Salvia sonomensis x clevelandii*), chaparral mallow (*Malacothanus fasciculatum*), chalk dudleya (*Dudleya pulverulenta*), canyon grey sagebrush (*Artemisia californica* var. 'canyon gray'), Catalina currant (*Ribes viburnifolium*), yerba buena (*Satureja douglasii*), pitcher sage (*Lepechina fragrans*), western swordfern (*Polystichum munitum*), Douglas iris (*Iris douglasiana*), island alumroot (*Heuchera maxima*), and sunset manzanita (*Arctostaphylos pajaricensis x hookeri*). The addition of these native species has the potential to promote regional biodiversity and increase the ecological value of the currently disturbed site.

**Comments suggest that the environmental setting of the project was not considered.**

**Response:** The environmental setting of the site was considered in this report and found that the project site is surrounded by roadways and residential/ commercial developments. No water resources were observed on the project site, and therefore no water resources are expected to be impacted, and no special-status aquatic species would occur. Finally, wildlife movement is not expected to be impacted by this project due to the heavy development and roads surrounding the site. Lincoln Park, which lies just to the south of the project site across Mission Rd., contains resources and viable habitat that is suitable for hosting special-status species. However, Mission Rd. creates a major barrier for terrestrial animal movement to and from this park, especially between the project site and the park. Animal movement between the project site and the park would be primarily limited to flying species. Regardless of their presence nearby or overhead, the site lacks native habitat that would be unlikely to host sensitive species, including birds, bats, and flying insects, but could still host common or non-native wildlife that are adapted to living in urban settings. Notably, City trees on Mission Rd. will not be impacted by the proposed development.

**Comments suggest the project would result in additional bird collisions and loss of bird nesting areas.**

**Response:** Every building has the potential for bird collisions into windows, but the project impacts would be minimal and would not rise to the level of significance according to CEQA. Because a non-significant number of birds would be impacted by this development and no nests would be impacted, it would not result in the reduction of bird populations enough to jeopardize their future existence. The site itself would replace many of the lost landscaping and trees with new landscaping and trees that would support nesting birds in the landscaping similar to the current condition. Also, the building is set within an area that is already densely developed and would not be considered a migratory pathway. The existing setting of the project site within a developed area limits the risk to birds as the birds in the region are acclimated to living in a urban setting.

Based on the analysis above, the site lacks habitats for the special-status species that were observed flying over or in a park near the site. Development at the site would not have any impacts or effects to habitat for these species as none occurs, and the nearest habitat in Lincoln Park on the southern side of Mission Rd. would be avoided by the project. It should be noted that the project proposes to construct new housing in an urban area that is entirely surrounded by existing houses and roads, and does not propose to construct in an area with native habitat. The proposed project would have not impact on native habitats or special-status species.

## Conclusion

The property does not provide habitat for special-status species, and their presence on the property is highly unlikely due to the absence of native habitats, wetlands, or waterways on the parcel. There are several mature western sycamore trees on the parcel, but they are not protected under the City of LA Protected Tree Ordinance because they are landscaped and not naturally occurring. Additionally, the community is dominated by non-native trees with less than 30% of the relative canopy cover on the parcel as western sycamore and is therefore not considered a California Sycamore - Coast Live Oak Riparian Woodland Alliance as defined by the California Native Plant Society (CNPS) Manual of California Vegetation Online membership rules. As a result, this project does not have the potential to impact protected biological resources found on the site. The Biologist's Statement of Biological Resources is in Attachment A, photos of the parcel are in Attachment B, the arborist report is in Attachment C, and the biologist's resumes are in Attachment D.

If you have any questions regarding the information in this report, please contact Matthew South by email: [msouth@southernenvironmental.com](mailto:msouth@southernenvironmental.com) or by mobile phone: 303-818-3632.

Sincerely,



Matthew R. South  
Principal Biologist

## List of Attachments

1. **Attachment A.** Biologist's Statement of Biological Resources
2. **Attachment B.** Photograph Exhibit
3. **Attachment C.** Arborist Report
4. **Attachment D.** Biologist's Resume

# Attachment A:

Biologist's Statement of Biological  
Resources





## BIOLOGIST'S STATEMENT OF BIOLOGICAL RESOURCES

The California Environmental Quality Act (CEQA) directs public agencies to assess and disclose the environmental effects of the projects it approves. In determining whether a proposed project is subject to CEQA, the City of Los Angeles is required to consider any potentially adverse impacts the project may have on biological resources. Failure by a project applicant to disclose known biological resources on the project site may result in a violation of CEQA.

**Date of Site Visit:** \_\_\_\_\_

**Project Address or APN(s)<sup>1</sup>:** \_\_\_\_\_

*Does the project site contain certain known biological resources, and if so, will the project require biological analysis by a qualified biologist? (Follow the instructions for each respective answer.)*

☐ **Yes.** The project site contains one or more of the following biological resources: (Check all that apply)

☐ Water Resources, including but not limited to, streams, wetlands, or other permanent / seasonal water bodies

☐ Protected Trees and/or Shrubs, or certain trees within the Coastal Zone (See Appendix A)

☐ California Natural Diversity Database (CNDDDB) records of sensitive and special status species within the appropriate United States Geological Survey (USGS) quadrangle and/or within a 0.25-mile radius of the project site

☐ Other: (Describe below)

\_\_\_\_\_  
\_\_\_\_\_

☐ **No.** The project site does not contain any of the above biological resources.

*If No, sign and return the form (plus Appendix B attachments) to the appropriate department within the City of Los Angeles at the time of filing for permits/entitlements.*

*If Yes, will the project remove or possibly affect any of the above marked biological resources?*

\_\_\_\_\_

<sup>1</sup> Include the entire site, not just the development footprint.

- ☐ **Yes.** The project will require biological resources analysis (Biological Resources Report) by a Qualified Biologist. (See Appendix A)

Please describe which of the above biological resources may be affected by the project:

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- ☐ **No<sup>2</sup>.** The project site will not remove or possibly affect any of the above biological resources.

Please describe how the project will not remove or possibly affect the biological resources:

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*If No, sign and return the form (plus Appendix B attachments) to the appropriate department within the City of Los Angeles at the time of filing for permits/entitlements.*

**Name of Lead Biologist**

---

**Lead Biologist Signature**



**Date** 

---

**Names of Additional Biologists**

---

---

**Company Name  
& Contact Information**

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<sup>2</sup> Projects may instead submit the Owner's Declaration of Biological Resources (CP-3612) if the project will not remove any vegetation (including trees) nor affect any water resources.

## Owner's Declaration

I own the property located at \_\_\_\_\_. I have read the above "Notice to Owner." I acknowledge and understand that should the City determine that the project site contains any of the above biological resources, the City may require biological resources analysis by a qualified biologist prior to completing the CEQA analysis. I certify that the project site does not contain any of the above biological resources to the best of my knowledge.

Name of the Owner (Print) \_\_\_\_\_

Owner Signature \_\_\_\_\_ Date \_\_\_\_\_

## Notary Acknowledgment

*A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.*

State of California  
County of Los Angeles

On \_\_\_\_\_ before me, \_\_\_\_\_  
(insert name and title of the officer)

Personally appeared \_\_\_\_\_, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the \_\_\_\_\_ person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature \_\_\_\_\_ (Seal)

## APPENDIX A - REFERENCES

**Qualified Biologist.** A person with the appropriate education, training, and experience to conduct biological surveys, monitor Project activities that have the potential to affect biological resources, provide construction worker education programs related to the protection of biological resources, and supervise or perform other tasks related to biological resources; possesses a Bachelor of Science degree or Bachelor of Arts degree in biology, ecology, or a related environmental science; has at least five years of professional experience that requires knowledge of natural history, habitat affinities, and identification of flora and fauna species, and relevant local, state and federal laws and regulations governing the protection of biological resources; and meets the California Department of Fish and Wildlife (CDFW) qualifications for botanical field surveyors.

### Protected Trees & Shrubs

- Oak, including valley oak (*Quercus lobota*) and coast live oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the California scrub oak (*Quercus berberidifolia*)
- Southern California black walnut (*Juglans californica*)
- Western sycamore (*Platanus racemosa*)
- California bay (*Umbellularia californica*)
- Mexican elderberry (*Sambucus mexicana*)
- Toyon (*Heteromeles arbutifolia*)

### Monarch Butterfly Overwintering Trees (only applicable within the Coastal Zone)

- Monterey cypress (*Cupressus macrocarpa*)
- Monterey pine (*Pinus radiata*)
- Coast redwood (*Sequoia sempervirens*)
- Coast live oak (*Quercus agrifolia*)
- Douglas-fir (*Pseudotsuga menziesii*)
- Western sycamore (*Platanus racemosa*)
- Bishop pine (*Pinus muricata*)
- Any Eucalyptus species

## APPENDIX B - REQUIRED DOCUMENTS

- Site Plan
- Tree Disclosure Statement
- Biologist Proof of Qualifications

# Attachment B:

## Photograph Exhibit





**Image 1.** View of Barbee St. adjacent to main vehicle entrance of **3601 North Mission Road**, facing west.



**Image 2.** View of Barbee St. adjacent to main vehicle entrance (right) of 3601 North Mission Road, facing east.





**Image 3.** View of 3601 North Mission Rd. main vehicle entrance on Barbee St and parking lot.



**Image 4.** View of asphalt parking lot area on parcel featuring some ornamental trees and shrubs, facing southwest.





**Image 5.** View of parking lot area on parcel, facing southeast.



**Image 6.** View of parking lot area on parcel with perimeter wooden fence and vehicle gate in background, facing northwest. Ornamental trees include western sycamore (center).





**Image 7.** View of southern side of parcel featuring packed dirt and ornamental trees, facing northeast.



**Image 8.** View of bordering walkways adjacent to building; dark wooden fence in background divides parking lot section in the north from this area.





**Image 9.** View of yard with bordering wall along property line; understory is highly disturbed.



**Image 10.** View of bordering wall along Lincoln Park Ave. to the west and pedestrian access gate; residential developments surround the parcel.

# Attachment C:

## Arborist Report



## Protected Tree Report

1. Tree Expert: Stephanie Reed, Landscape Architect 6086, ISA Certified Arborist  
WE-11453A, 4572 Via Marina #105, Marina del Rey, CA 90292. phone:(424)385-8721.  
email: stephanie@upla.studio
2. PTR Prepared by: Stephanie Reed
3. Prepared for: KSA Design Studio, 6150 Washington Blvd, Culver City, CA 90232. phone:  
310-574-4460. email: a.stinson@ksa-la.com
4. Site Address and description: 3601 Mission Road, Los Angeles, CA 90031. APN:  
5211-009-015. The site is currently a paved commercial parking lot.
5. Date Prepared: 09-13-2022
6. Date of Field Survey: 06-30-2022
7. PTR Purpose: KSA Design Studio contacted the arborist with requirements for the city of  
Los Angeles for a protected tree report (PTR) for land development purposes. This report  
is being prepared in accordance with the City of Los Angeles Protected Tree Ordinance  
No. **186873**.
8. Table of Contents [Listed Below]
9. Project Description and Background: Developer plans to remove all existing structures,  
grade and develop a multi-story, multi-unit residential structure.
10. Square footage of Entire Property: 50,656 SF. Square footage of proposed structure:  
152,000 SF

### Table of contents:

11. Field Observations	Page 2
12. Findings	Page 3
13. Recommendations	Page 4
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15. Mitigation	Page 4
16. Protected Tree Construction Impact Guidelines	Page 4
17. Matrix summarizing observations (protected trees)	Page 4
18. Proposed protected tree removals	Page 4
19. Proposed protected trees remaining	Page 4
20. Color Photos of protected Trees	Page 4
21. Topo map with trees plotted	Page 5
22. Landscape Plan	Page 6
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25. Arborist's opinion whether naturally occurring	Page 10
26. Pictures of Protective fencing	Page 10
27. Reason for removal	Page 10



11. Field Observations:

FIELD OBSERVATION MATRIX - Protected Trees										Non Protected Trees		
Address: 3601 N Mission Rd												
Date: June 2022												
APN: 5211-009-015												
Time: 12:00 PM												
Weather: Overcast												
Form		Physical Condition								Treatment	Rating	Rating Code
Size												
Tree Number												
<i>Quercus agrifolia</i>												
<i>Umbellularia californica</i>												
<i>Juglans californica</i>												
<i>Platanus racemosa</i>												
<i>Sambucus mexicana</i>												
<i>Heteromeles arbutifolia</i>												
Trunk Dia. @ 4.5' above base (in)												
Height (ft)												
Spread (ft)												
Tree Declining												
Drought Stressed												
Broken Hanging Limb(s)												
Weak Main Crotch(s)												
Sparse Foliage												
Fire Damage												
Cavity(s) in tree												
Trunk Damage or Exudation												
Hollow Trunk or Cavity												
Mainstem Dieback												
Insect Damaged												
Diseased												
Leaning												
Soil Buildup at Base												
Regrown Stump												
Surface Roots												
Safety Hazard												
Safety Prune (Crown Reduction)												
Raise Canopy												
Remove Deadwood												
Insect Treatment												
Health												
Aesthetics & Conformity												
Balance												
A = EXCELLENT B = GOOD C = FAIR D = POOR E = NEARLY DEAD F = DEAD R = Remove for Construct I = Impacted T = Transplantable NT = Not Transplantable BMC = Below Main Crotch Remarks												



## 12. Findings:

The definition of Protected Tree in Section 17.02 of the Los Angeles Municipal Code reads as follows:

**Protected Tree or Shrub** (Amended by Ord. No. 186,873, Eff. 2/4/21.) – Any of the following Southern California indigenous tree species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub:

### Protected Trees:

(a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to Southern California but excluding the Scrub Oak (*Quercus berberidifolia*).

(b) Southern California Black Walnut (*Juglans californica*).

(c) Western Sycamore (*Platanus racemosa*).

(d) California Bay (*Umeellularia californica*).

### Protected Shrubs:

(a) Mexican Elderberry (*Sambucus mexicana*).

(b) Toyon (*Heteromeles arbutifolia*).

**The definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees planted or grown as part of a tree planting program.**

There are 5 Sycamore trees grown from nursery stock on sites that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

There are several trees on abutting property that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

There are several street trees in the right-of way that are not protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

Previous development plans and historic photos of the site show evidence that the Sycamore trees are not naturally occurring. See item 24. Other information for Demolition plan, landscape plan, and historic site photos.





13. Recommendations:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

14. Trees tagged and numbered:

No trees have been tagged, however all have been assigned numbers and identified in this report.

15. Mitigation:

There are no protected trees on site, and no mitigation is required.

16. Protected Tree Construction Impact Guidelines:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

17. Matrix summarizing observations (protected trees)

Total number of protected trees on map:	<u>0</u>
Total Number of Declining or dead protected trees:	<u>0</u>
Total number of protected trees to be impacted by construction within dripline:	<u>0</u>
Total number of protected trees not dead, not removed or impacted:	<u>0</u>

18. Proposed protected tree removals

Tree Number	Species	Height	DBH	Spread	Condition	Suggested Treatment	Rating	Other
none								

19. Proposed protected trees remaining

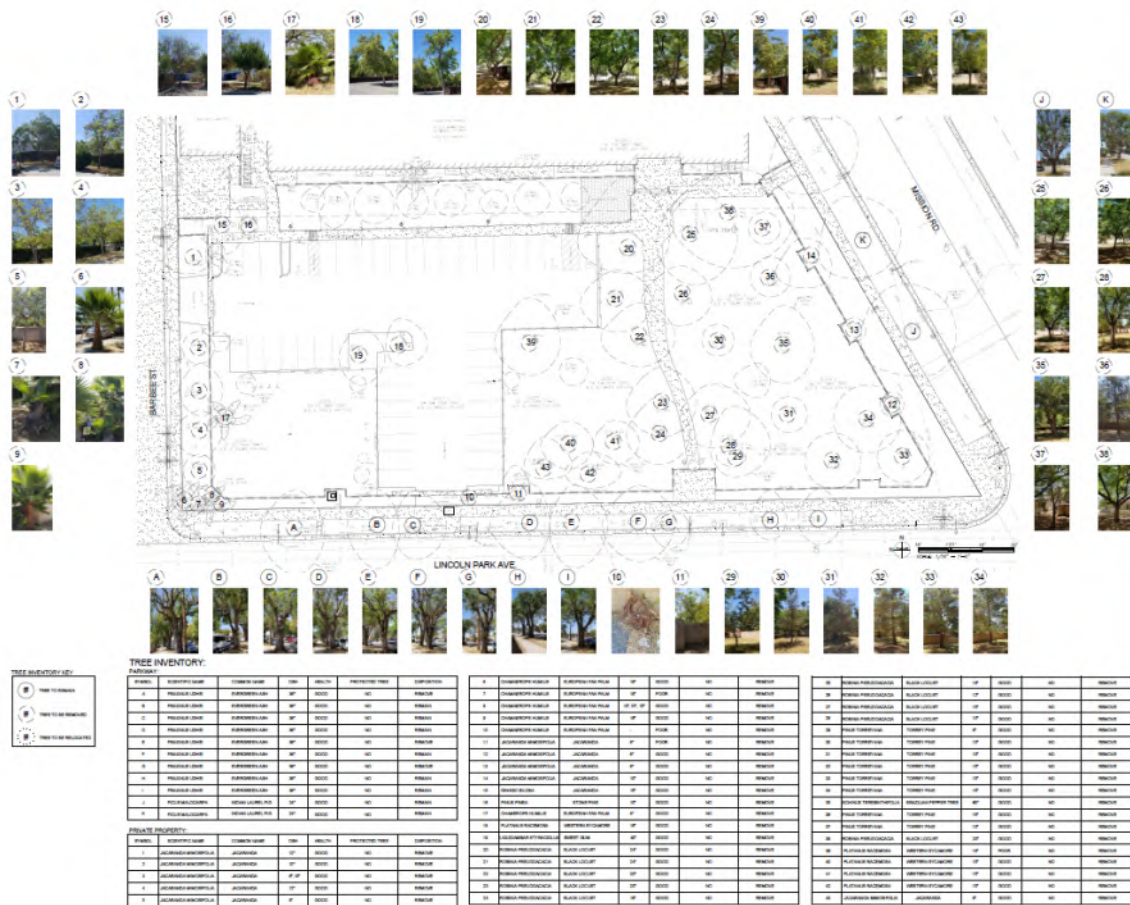
Tree Number	Species	Height	DBH	Spread	Condition	Suggested Treatment	Rating	Other
none								

20. Color Photos of Protected Trees.

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

## 21. Topo map with trees plotted

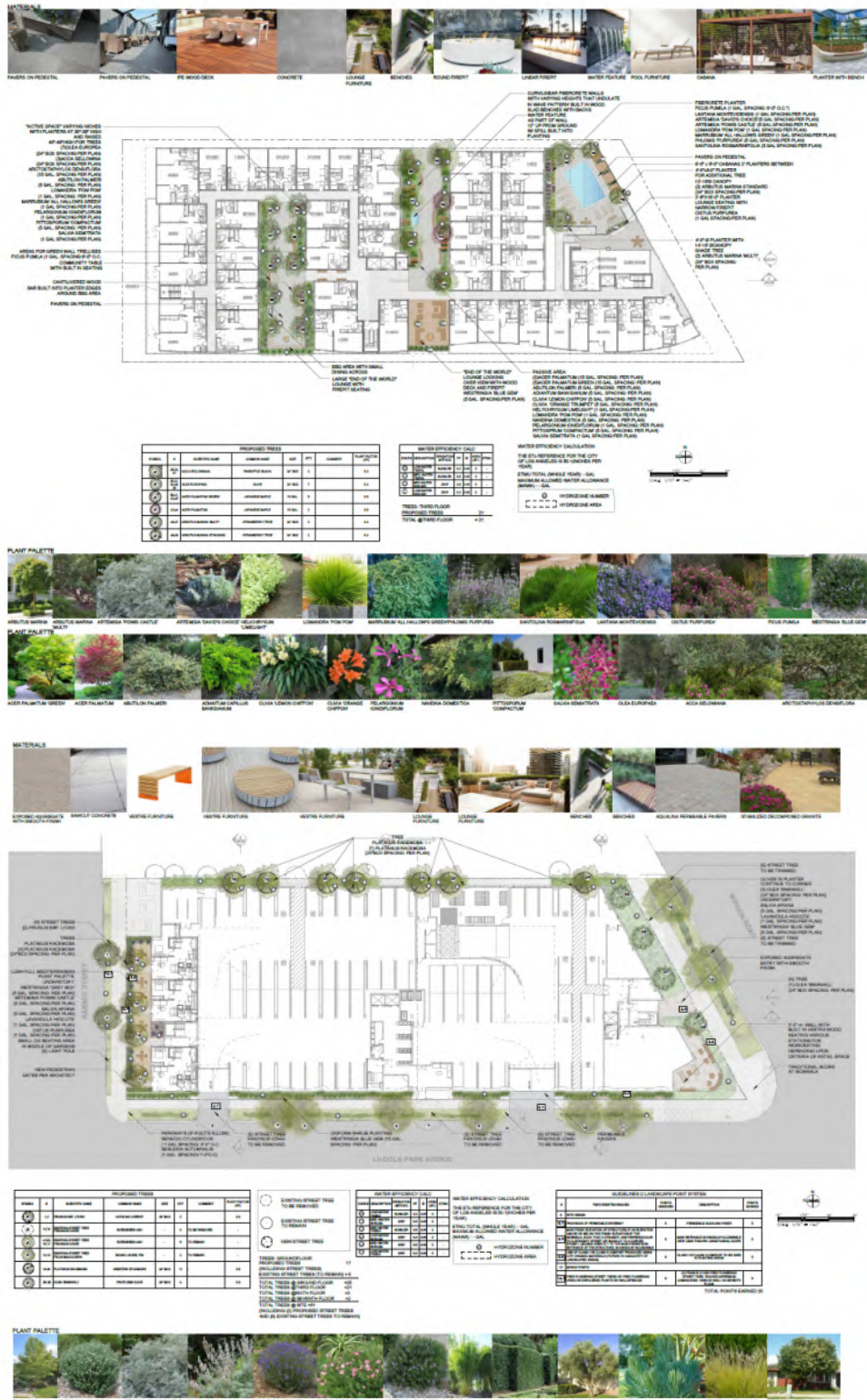
There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.





## 22. Landscape Plan

There are no replacement trees or other mitigation required.



**NOT FOR CONSTRUCTION**

**UPLA**  
UPLA STUDIO  
3601 MISSION ROAD  
LOS ANGELES, CA 90031  
TEL: (424) 385-8721  
WWW.UPLA.STUDIO

**ISA Inc.**  
ISA Inc.  
3601 MISSION ROAD  
LOS ANGELES, CA 90031  
TEL: (424) 385-8721  
WWW.ISA-INC.COM

**Lincoln Park Holdings LLC**  
Lincoln Park Holdings LLC  
3601 MISSION ROAD  
LOS ANGELES, CA 90031  
TEL: (424) 385-8721  
WWW.LINCOLNPARKHOLDINGS.COM

**3601 MISSION**  
3601 MISSION ROAD  
LOS ANGELES, CA 90031  
TEL: (424) 385-8721  
WWW.3601MISSION.COM

**ENTITLEMENT SET**  
08.15.22

**L2.0**  
L2.0

**L1.0**  
L1.0

## 23. Current Licenses and certificates

Remove your new Pocket Certificate from the receipt portion and carry it with you at all times.

7/15/21  
7/15/21

CUT HERE

CUT HERE

CUT HERE

CUT HERE

CALIFORNIA ARCHITECTS BOARD  
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE  
2420 DEL PASO ROAD, SUITE 105  
SACRAMENTO, CA 95834  
916 575-7230

STATE OF CALIFORNIA  
dca  
DEPARTMENT OF CONSUMER AFFAIRS

LANDSCAPE ARCHITECT

CERTIFICATE NO. 6086

STEPHANIE ANNE REED  
4572 VIA MARINA APT 105  
MARINA DEL REY CA 90292

EXPIRATION 09/30/23

LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE  
2420 DEL PASO ROAD, SUITE 105  
SACRAMENTO, CA 95834  
916 575-7230

IMPORTANT

1. Please include your Certificate Number on any correspondence to this office.
2. Notify the Program of any name or address change in writing.
3. Report any loss of this certificate immediately in writing to the Program.
4. Please sign and carry the Pocket Certificate with you.

STEPHANIE ANNE REED

CERTIFICATE NO. 6086

EXPIRATION DATE 09/30/23

RECEIPT NO. 11962001

Signature \_\_\_\_\_

PLALA 10/31/07

This is your receipt. Please save for your records.



## The International Society of Arboriculture

Hereby Announces That

*Stephanie Reed*

Has Earned the Credential

## ISA Certified Arborist ®

By successfully meeting ISA Certified Arborist certification requirements through demonstrated attainment of relevant competencies as supported by the ISA Credentialing Council

*Caitlyn Pollihan*  
Caitlyn Pollihan  
CEO & Executive Director

30 January 2016

Issue Date

30 June 2025

Expiration Date

WE-11453A

Certification Number



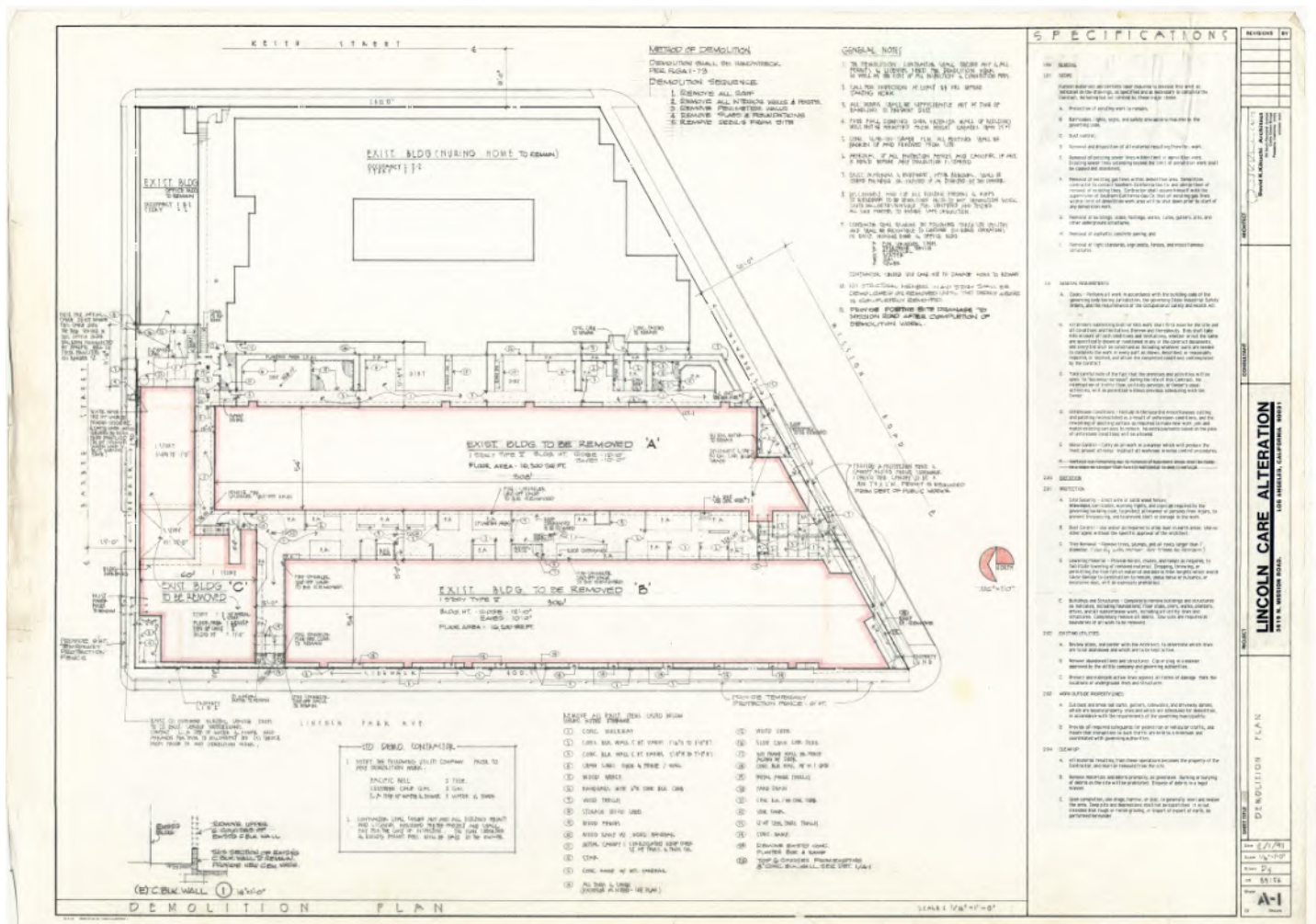


## 24. Other information

The geotechnical report, submitted separately, shows that the site was previously developed on compacted backfill. The structural engineer has required that the building footprint will need to be over-excavated by 5 feet in addition to the 3 feet for the foundation.

Please review the following documents as evidence that the Sycamore trees are not naturally occurring:

A. Demolition plan from 1989 showing that there were buildings at the exact location of the Sycamores. In other words, the trees could not have existed there before that time.



- B. Site photos taken by the previous owner in July 1999, before they renovated the site, clearly showing that the yard area in question did not have the sycamores at that time.

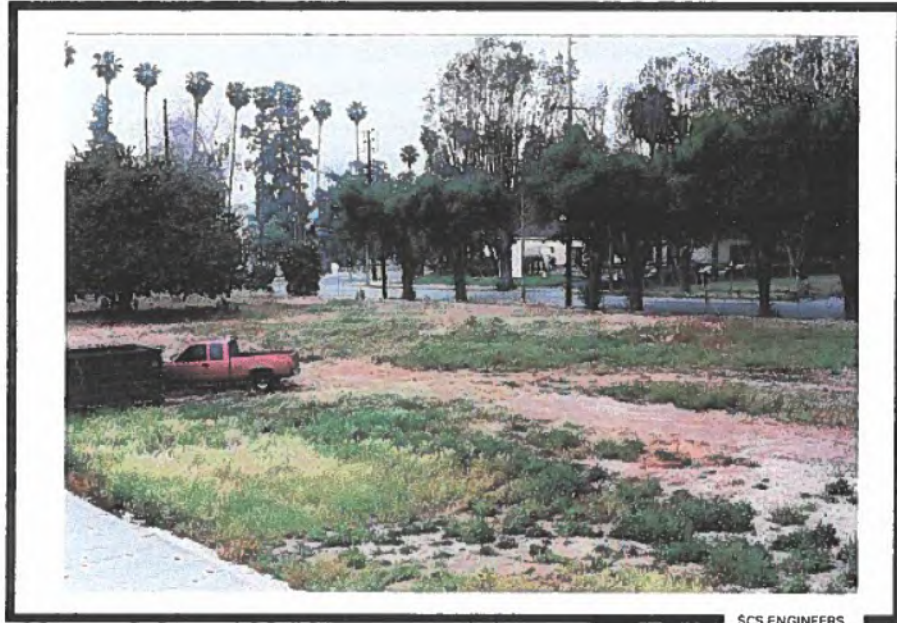


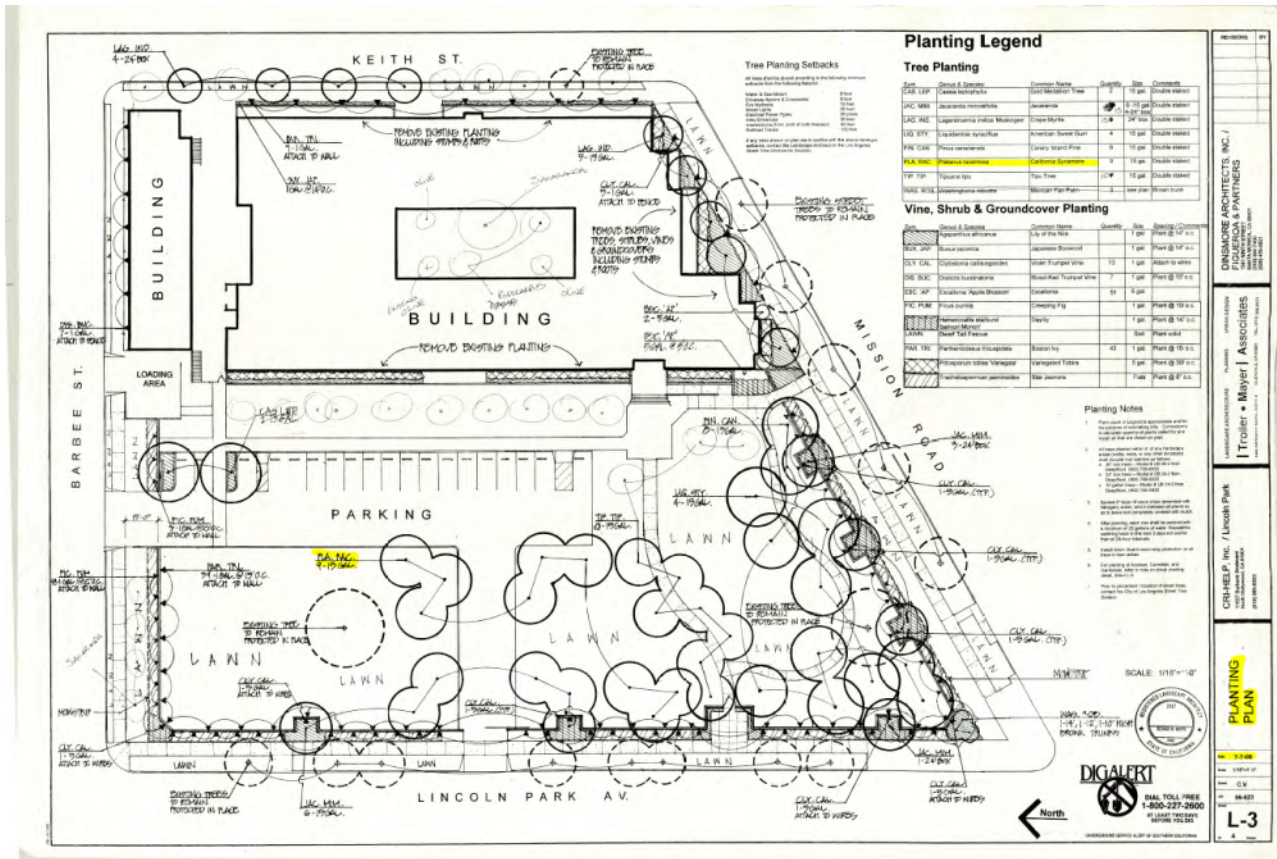
Photo 7. View Southwest Across Western Half of Project Site.



Photo 8. View Northwest Across Western Half of Project Site.



C. Previous Owner's Landscaping plans from July 7, 2000 - this was a part of the renovation drawings set when Cri-Help converted the entire site for their use - which clearly indicate that they planted 9, 15 Gallons CA Sycamores in the exact location the existing Sycamores are located. The highlighted areas pertain to the Sycamores. As we know, only 5 tree currently exist there, but we can't really tell if the other 4 were previously removed or didn't grow by themselves.



25. Arborist's opinion whether naturally occurring

It is the arborist's opinion that the Sycamore trees have been planted by nursery stock and as such are not protected by the Los Angeles Tree Protection Ordinance.

## 26. Pictures of Protective fencing

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

27. Reason for Removal:

There are no trees on site that are protected by the Los Angeles Tree Protection Ordinance and will be impacted by construction.

# Attachment D:

## Biologist's Resume

## EDUCATION

B.S., Wildlife Ecology, University of Wisconsin-Madison, 2004

## CERTIFICATIONS

Certified Wildlife Biologist, The Wildlife Society 2014

ISA Certified Arborist (WE-12564A) 2019

Certified Technical Service Provider (TSP) for Fish and Wildlife Management Plans, USDA NRCS 2017

Authorized Desert Tortoise Biologist – Numerous BOs

Unmanned Aircraft System Pilot Certification, FAA #4177603

## TRAINING

Wetland Delineation Training Course – The Wetland Institute (2014)

Southwest Willow Flycatcher Workshop, 2017

USGS Desert Tortoise Health Assessment and Tissue Collection Techniques Training, 2009

# Matthew South

## PRINCIPAL BIOLOGIST

Matthew South founded South Environmental in 2018. He is a certified wildlife biologist and certified arborist with 20 years of professional experience providing natural resources consulting services for a wide variety of clients that include residential, commercial, government, utility, infrastructure, research, and non-profit projects. For the last 15 years, Mr. South has been an environmental consultant in southern California acting as a Wildlife Biologist and Geographic Information System (GIS) Analyst. In early 2018 he started South Environmental and has since been supporting clients in Los Angeles, Ventura, San Bernardino, and Riverside Counties.

Mr. South's background in ecology has led to a passion for conservation planning and resources assessments for the purpose of preservation and management. The integration of the latest technologies such as advanced GIS systems, mobile computing, and drone sensing allows him to innovate new data collection, analysis, and collaboration tools for the environmental sciences that produce more accurate data and better-informed resource managers.

## EXPERTISE

- **Conservation and Management Planning.** Mr. South's has extensive experience preparing mitigation and monitoring plans, habitat conservation plans, and technical biological resources management plans that are compliant with federal, state, and local regulations. Mr. South is the only active NRCS TSP for Fish and Wildlife Plans Certified in California.
- **Biological Resources Assessment.** Mr. South has completed dozens of biological resources assessments throughout southern California.
- **Rare Plants and Arborist Services.** Mr. South has surveyed and assessed thousands of native and landscaped trees in southern California. He is a certified arborist with 5-years of tree survey experience working closely with some of the most experienced arborists in California. In addition, he has performed hundreds of hours of rare plant surveys and habitat assessments.
- **Wetland & Jurisdictional Delineations.** Mr. South has conducted dozens of jurisdictional and wetland delineations per the guidelines and methods from the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the state Regional Water Quality Control Boards (RWQCB).
- **GIS.** Mr. South is an expert at spatial data collection and analysis using ESRI mobile and desktop software products and Trimble hardware.

## SELECT MOUNTAIN LION ASSESSMENT EXPERIENCE

**Mountain Lion Study – Granito Drive Project (2022).** Mr. South planned and implemented a focused mountain lion study for a large single-family development within the Santa Monica Mountains that assessed habitat, wildlife movement corridors, impacts to habitat blocks, and impacts foraging, denning, and movement areas. The study was a local, regional, and population wide assessment of mountain lions. The study relied on a site survey, camera trap study, and a literature review. The study was prepared in response to comments from the City of Los Angeles biologists and public comments on the biological resources assessment regarding potential impacts to mountain lions.

**Focused Mountain Lion Assessment – Marlay Drive Project (2022).** Mr. South was contracted as a subject-matter expert to prepare focused mountain lion habitat assessment for a proposed single-family home development in the Santa Monica Mountains. The focused study relied on a literature review and assessment of habitat from existing sources and was in response to comments from the City of Los Angeles and CDFW on a report written by another firm.

**Various Biology Reports with Mountain Lion Assessments (2020-present).** Mr. South has prepared or overseen the preparation of hundreds of biological resources assessment reports with mountain lion focused assessments since the mountain lion became a candidate for listing to the California Endangered Species Act. These reports are prepared within the range of the population of mountain lions that is the target of the listing status, in the Santa Monica Mountains, San Gabriel Mountains, Simi Hills, and Verdugo Hills. Select Projects include:

- Baseline Road in LaVerne
- Altadena Hills Project
- 16 Beverly Park
- 64 Beverly Park
- 74 Beverly Park
- 79 Beverly Park
- Toyopa Drive
- Mapleton Drive
- Tigertail
- 680 Sarbonne
- 777 Sarbonne
- Stradella Road
- Tower Grove
- Bella Drive
- Chautauqua Boulevard
- Benedict Canyon
- Haslam Terrace
- Summitridge Drive
- Rial Lane
- Outpost Ave
- Pasquera
- Beverly Grove
- Multiple Granito Drive Projects
- Floral and Electra Drive Project
- Hillside
- Magnolia
- Swallow
- Sierra Mar
- Beverly Grove
- Stradella
- Chalon Road
- Moraga
- Brentridge
- Viewcrest
- Old Chimney Road
- Multiple Developments on Mulholland Highway
- Berkley Hall School Project
- Charmel Lane
- Paseo Miramar Roadway Project
- Posetano-Revello Project
- Palmera
- Shadow Mountain Drive
- Astral Project
- Nofral Road Projects
- San Onofre Drive
- Crescent Drive



## OTHER SELECT PROJECT EXPERIENCE

**Southern California Gas (SCG) As-Needed Natural and Cultural Resources Services (2022-ongoing).** As a subconsultant on this contract Mr. South has overseen the assessment numerous resources from single point locations to many miles of pipelines. More recently he has begun to conduct biological assessment in the coastal zone in Santa Barbara County as well as endangered species Biological Assessments (BAs) in support of Coastal Development Permits for SCG. Wetland delineation and permitting, biological resources assessments, and resources surveys and monitoring are services that Mr. South both provides personally and oversees a team of specialists that support the environmental impacts analysis and permitting for SCG.

**Santa Clarita VTTM Multi-Use Development Project (2018-ongoing).** South Environmental prepared a biological resources assessment report, jurisdictional delineation, rare plant survey, and a focused oak tree survey and report for a proposed large-scale development that includes mixed uses such as senior living, commercial areas, and residential developments. South Environmental has been retained to prepare permit applications following the completion of the projects CEQA analysis.

**City of Palmdale - Confidential Project (2022-ongoing).** South Environmental prepared a jurisdictional delineation and permit applications to CDFW and RWQCB for the project. Services included EPIMS application and RWQCB Dredge and Fill Application and coordination including for mitigation management and alternatives analysis. This is a large-scale warehouse development next to a major river and has many protected resources and multi-agency involvement.

**Southern California Edison (SCE) As-Needed Natural and Cultural Resources Services (2021-ongoing).** As a subconsultant on this contract for multiple Primes (SWCA, EI, Rincon, and Stantec), South Environmental has focused its biological resources services on wetland delineations and permitting efforts for SCE throughout all its regions. From single pole delineations in roadside ditches to several hundred poles through miles of wet meadows in the Sierras, the projects vary in size and complexity as well as location. Primarily, delineations have been in the Sierras with the largest and most complex projects in Inyo and Mono Counties and several in Kern and Tulare. A few of the specific projects include

- Pickle Meadow: Aquatic Resources Delineation Report and Permitting for 300-poles located in a wet meadow behind Bridgeport Reservoir.
- Kern River: Wetland Delineation and Permitting for 15 pole replacements in Kernville.
- June Lake to Tom's Place: Wetland Delineation and Permitting for 40 poles spread through Inyo and Mono Counties.
- Cajon Wash: Jurisdictional Delineation and SBKR Assessment and Permitting for 10 pole replacements and realignment for a capital project located in SBKR Critical Habitat.
- Pipes Wash: Delineation and Permitting for 25-poles that are within Pipes Wash, a large ephemeral wash in the San Bernardino desert.

## EDUCATION

B.S., Ecology, Evolution, &  
Organismal Biology, California  
State University, Monterey Bay,  
2017

M.S., Conservation and  
Restoration Science, University  
of California, Irvine, 2022

## SKILLS

-Scientific collection and  
management of field data

-Technical writing

-Project management and  
risk assessment

-Plant and animal  
identification through  
dichotomous keys, field  
guides, and experience

-Statistical analyses through  
R Studio

## CERTIFICATIONS

-Wilderness First Aid  
Certification

# Dana Briggs Wyler

## BIOLOGIST

Dana Briggs Wyler is a current environmental professional and recent graduate from University of California, Irvine's Masters in Conservation and Restoration Science program. Here, she specialized in project management, restoration design, and field monitoring in areas with sensitive species. She has extensive field data collection and restoration experience in central and southern California learned while in school. While at UCI, she was involved with a project monitoring a fuel modification zone using native plant species to support regional biodiversity, especially Least Bell's Vireo and California Gnatcatcher. She also participated in a restoration and monitoring program of native grasslands in Irvine aimed to provide data for community resilience to fire. More recently, she worked for Southern California Coastal Water Research Project as a toxicologist where she conducted research and assessments of southern California's water resources.

## EXPERTISE

- **Field Data Collection.** Dana has extensive experience collecting data in diverse terrestrial and aquatic habitats in both southern and central California.
- **Biological Monitoring.** Dana has diverse experience identifying wildlife species throughout the Southern California region.
- **Plant Identification.** Dana is proficient in identifying native, non-native, and invasive plant species throughout southern California, specifically in coastal, wetland, riparian, and chaparral.
- **Technical Writing.** Dana has prepared numerous biological resource assessments reports for the city of Los Angeles. Reports include detail-oriented descriptions of biological resources, surveys for special-status species, biological resources maps, and assessments of potential impacts to biological resources from development.
- **Data Management and Analysis.** Dana has significant expertise in statistical analyses as well as producing statistical figures through R Studio. She has extensive experience working with both single data sets as well as large databases.

## SELECT PROJECT EXPERIENCE

**South Environmental, Monitoring Biologist. Ramona Expressway (2023-present).** As a Biologist for South Environmental, Dana's responsibilities were to provide WEAP trainings and biological monitoring for the Ramona Expressway project with First Carbon. Duties included:

- Conduct Worker Environmental Awareness Program (WEAP) training to all onsite construction personnel to describe species of concern and requirements to protect them under the Endangered Species Act and the Western Riverside Multi-Species Habitat Conservation Plan and mitigation measures being implemented on the project site to conserve the species of concern.
- Monitoring construction activities for the duration of project activities to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat and species:
  - establish environmentally sensitive areas around sensitive biological resources on the project site during the construction phase.
  - ensure that vegetation clearance activities limit disturbance to the smallest practical area and that construction personnel and activities do not enter environmentally sensitive areas.
  - perform daily pre-construction sweeps of work areas prior to initiation of daily construction activities.
  - inspect open trenches, pits, and pipes or other materials within which a covered species or other sensitive species may become entrapped or hide within.
  - Summarize relevant findings in a letter report that will be prepared at the completion of ground disturbing activities.

**Aliso Canyon Emergency Monitoring Project Southern California Gas (2023-present).** Dana is the lead monitor for a long-term project that includes the removal of sediment from catch basins where sensitive wetlands and wildlife such as coast range newt occurs. Dana is responsible for overseeing the monitoring effort, daily reports, and overall project compliance.

**City of LA Recreation and Parks City Park Brush Clearance Monitoring within Riparian Areas (2023).** Dana was the primary monitor that conducted nesting bird surveys and compliance monitoring at White Point Park where brush clearance is performed annually to meet LA Fire Department requirements. The work was within and near riparian areas and wetland and riparian vegetation and wildlife were the target species. Also, Dana monitored nesting coastal California gnatcatchers at this site and protected the nest during the project.

**City of Los Angeles Biological Resources Assessments (2023 – present).** Dana conducts site assessments for biological resources, surveys for special-status plants and animals, maps and characterizes plant communities and wetlands/streams, and assesses potential impacts to biological resources from proposed developments. Dana has worked on the following reports:

- 41 Mar Vista Biological Resources Report in the Santa Monica Mountains Local Coastal Program (LCP)
- 4801 Knob Hill Drive Biologist's Statement of Biological Resources
- 1746 Mandeville SB9 Statement of Habitat
- 2460 Sunset Plaza SB9 Statement of Habitat
- 21050 San Miguel SB9 Statement of Habitat
- 11496 Orum SB9 Statement of Habitat & California Wildlife Habitat Relationship (CWHR) Assessment



- 230 Carolwood Biologist's Statement of Biological Resources
- 2383 Mandeville Canyon Biologist's Statement of Biological Resources
- 4960 Calvin SB9 Statement of Habitat
- 8152 Ellenbogen SB9 Statement of Habitat
- 10826 Tuxford Statement of Habitat

Dana has also conducted the following monitoring projects:

- Ramona Expressway monitoring biologist
- Glenoaks/ SoCal Edison compliance monitoring
- White Point nesting bird survey and monitoring

**Southern California Coastal Water Research Project (2021 – 2022).** Dana was a laboratory and field assistant for coastal wetlands project. Dana later was promoted to research technician in the toxicology department where she coordinated and implemented a water toxicology experiment that support southern California wetlands and waters.

# Exhibit D

November 6, 2023

**Mr. Shay Yadin**  
**Lincoln Park Holdings, LLC**  
100 South Citrus Avenue  
Los Angeles, California 90036

**RE: ENVIRONMENTAL REVIEW**

Earth Science LLC (Earth Science) is pleased to present this Environmental Review Report for the property located at 3601-3615 North Mission Road, Los Angeles, California 90031 (herein referred to as the “Site”) and the offsite properties located at 2037 Lincoln Park Avenue, Los Angeles, California 90031 and 3801 North Mission Road, Los Angeles, California 90031.

As part of this Environmental Review, Earth Science reviewed various publically-available documents from the California State Water Resources Control Board’s GeoTracker Database, including but not limited to the following documents:

- Approval of Site Closure – Amistad Apartments Property, 2037 Lincoln Park Avenue, Los Angeles, CA (SLIC No. 996), prepared by the California State Water Resources Control Board Los Angeles Region, dated May 7, 2002.
- Underground Storage Tank Program Low Risk Case Review Form, ACS Mission Property, 3801 Mission Road, Los Angeles, CA (LUSTIS File No. 900310361), prepared by the California State Water Resources Control Board Los Angeles Region, dated March 26, 2009.
- Underground Storage Tank Program – Case Closure, ACS Mission Property, 3801 Mission Road, Los Angeles, CA (File No. 900310361; D-1 Site), prepared by the California State Water Resources Control Board Los Angeles Region, dated March 30, 2009.

Copies of the above-listed and reviewed documents are attached to this Environmental Review Report.

This Environmental Review Report has been prepared by Earth Science at the request of Lincoln Park Holdings, LLC and in response to the following comments from a third party which were provided to Earth Science:

1. **Comment #1:** *“Soil contamination occurred at 2037 Lincoln Park Boulevard from a transformer factory dating back to the 1920s. This property is directly across the street from 3601 Mission Road. While remediation occurred for THPs in 2001 for the Lincoln Park Boulevard site, none has occurred at the Mission Road site. According to a preliminary analysis there is a high probability for lead and PCB contamination beyond the remediation site....”*
2. **Comment #2:** *“Under the DTSC list, the property behind the proposed site on 3801 Mission Road has contaminated water sources.”*

### **SUMMARY OF THE KEY FINDINGS OF EARTH SCIENCE’S ENVIRONMENTAL REVIEW**

Earth Science’s response to Comment #1 above is as follows:

- According to data obtained from the United States Geological Survey 7.5 Minute Topographic Map, Los Angeles, California Quadrangle (2022) and Google Earth (2023), the 2037 Lincoln Park Avenue property is located greater than 100 feet to the west of the Site (beyond Lincoln Park Avenue), the topography in the vicinity of the Site gradually slopes towards the southwest, and the elevation at the 2037 Lincoln Park Avenue property is generally the same as the Site’s elevation.
- According to data obtained from the California State Water Resources Control Board Los Angeles Region, the soil contamination located at the 2037 Lincoln Park Avenue property was removed in 2002 and legally disposed of at an offsite landfill facility.
- According to data obtained from the California State Water Resources Control Board Los Angeles Region, confirmatory soil sampling was performed across the 2037 Lincoln Park Avenue property which indicated that the soil contamination had been successfully removed and that concentrations of contaminants in soil (including lead and PCB contamination in soil) were either below laboratory detection limits or well below the clean-up levels.

- According to data obtained from the California State Water Resources Control Board Los Angeles Region, the 2037 Lincoln Park Avenue property received a Case Closure determination on May 7, 2002 from the State environmental regulatory agency.

Based on the above findings, Earth Science concludes that there is no pathway for soil contamination from the 2037 Lincoln Park Avenue property to impact the Site and no justification for the speculation that soil contamination from the 2037 Lincoln Park Avenue property impacted offsite properties, including the Site. Specifically, the fact that the soil contamination at the 2037 Lincoln Park Avenue property was cleaned up under State environmental regulatory agency oversight to the strictest cleanup standards allowing reuse of the property for residence land use and received a Case Closure determination, the fact that there is no significant elevation difference between the 2037 Lincoln Park Avenue property and the Site, and the fact that the 2037 Lincoln Park Avenue property is located over 100 feet away from the Site, indicates that there is no evidence that the 2037 Lincoln Park Avenue property has impacted the Site or that the Site contains any potential soil contamination.

Earth Science's response to Comment #2 above is as follows:

- According to data obtained from the United States Geological Survey 7.5 Minute Topographic Map, Los Angeles, California Quadrangle (2022) and Google Earth (2023), the 3801 North Mission Road property is located approximately 650 feet to the east/northeast of the Site (beyond Keith Street, Barbee Street, and Parkside Avenue).
- According to data obtained from the California State Water Resources Control Board's GeoTracker Database, the groundwater flow direction in the vicinity of the Site flows in a southwesterly direction.
- Given the vast distance from the Site to the 3801 North Mission Road, position of the 3801 North Mission Road relative to the Site, and the reported groundwater flow direction in the vicinity of the Site, the 3801 North Mission Road property is interpreted as being hydrogeologically cross-gradient relative to the Site.
- According to data obtained from the California State Water Resources Control Board Los Angeles Region, the residual groundwater plume from a historic release of fuels stored in underground storage tanks at the 3801 North Mission Road property appeared to be stable and localized and fuel constituents were only detected in one of the six groundwater monitoring wells at the 3801 North Mission Road property (only in groundwater monitoring well MW-1).



- According to data obtained from the California State Water Resources Control Board Los Angeles Region, no contamination was detected in the most hydrogeologically down-gradient groundwater monitoring well (groundwater monitoring MW-4) located on the southwestern boundary of the 3801 North Mission Road property.
- According to data obtained from the California State Water Resources Control Board Los Angeles Region, the 3801 North Mission Road property received a Case Closure/No Further Action determination on March 30, 2009 from the State environmental regulatory agency.

Based on the above findings, Earth Science concludes that there is no pathway for groundwater contamination from the 3801 North Mission Road property to impact the Site and no justification for the speculation that groundwater contamination from the 3801 North Mission Road property impacted offsite properties, including the Site. Specifically, the fact that the 3801 North Mission Road property was cleaned up under State environmental regulatory agency oversight and received a Case Closure/No Further Action determination, the fact that the 3801 North Mission Road property is located approximately 650 feet away from the Site, the fact that the 3801 North Mission Road property is inferred to be situated hydrogeologically cross-gradient relative to the Site, and the fact that the most hydrogeologically down-gradient groundwater monitoring well located on the southwestern boundary of the 3801 North Mission Road property was non-detect for contamination, indicates that there is no evidence that the 3801 North Mission Road property has impacted the Site or that the Site contains any potential groundwater contamination.

## **REPORT CONCLUSIONS**

Based on the above findings, Earth Science concludes that no further investigation of the Site is warranted and that no concerns pertaining to potential soil or groundwater contamination exist at the Site.

## **REPORT LIMITATIONS**

Earth Science has performed a limited environmental review for the above-referenced Site. This limited environmental review incorporates a summary of the data reviewed and a brief summary of our findings, conclusions, and recommendations. Any and all findings, conclusions, and recommendations expressed or implied in this report are limited by the contractual scope of work and standard commercial methods used to perform these services.

In preparing this report, Earth Science has relied solely on information that has been provided and/or derived from secondary and third-party sources. Earth Science cannot and does not warrant or guarantee the information provided by these other sources. The conclusions set forth in this report are strictly limited in time and scope to the date of the evaluation. No other warranties are implied or expressed. All reports, both verbal and written, are for the sole use and benefit of Lincoln Park Holdings, LLC. This report has no other purpose and may not be relied upon by any other person or entity without prior written consent from Earth Science.

Should you have any questions or comments concerning this report, please contact our office at (949) 441-0433.

Respectfully,



**Sean Rakhshani**  
*USEPA AAI Qualified Environmental Professional*



**Mark H. Slatten, PG, CEG, CHG, PGp**  
*California Professional Geologist No. 4351*



**Attachments:**

*-Approval of Site Closure – Amistad Apartments Property, 2037 Lincoln Park Avenue, Los Angeles, CA (SLIC No. 996), prepared by the California State Water Resources Control Board Los Angeles Region, dated May 7, 2002.*

*-Underground Storage Tank Program Low Risk Case Review Form, ACS Mission Property, 3801 Mission Road, Los Angeles, CA (LUSTIS File No. 900310361), prepared by the California State Water Resources Control Board Los Angeles Region, dated March 26, 2009.*

*-Underground Storage Tank Program – Case Closure, ACS Mission Property, 3801 Mission Road, Los Angeles, CA (File No. 900310361; D-1 Site), prepared by the California State Water Resources Control Board Los Angeles Region, dated March 30, 2009.*



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## Los Angeles Region

Over 50 Years Serving Coastal Los Angeles and Ventura Counties

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>



Gray Davis  
Governor

May 7, 2002

Ms. Georgina Tamayo  
A Community of Friends  
3345 Wilshire Boulevard, Suite 1000  
Los Angeles, CA 90010

### APPROVAL OF SITE CLOSURE – AMISTAD APARTMENTS PROPERTY, 2037 LINCOLN PARK AVENUE, LOS ANGELES, CA (SLIC NO. 996)

Dear Ms. Tamayo:

Reference is made to the "Soil Remediation and Ground Water Assessment Activities Report" submitted by Advanced GeoEnvironmental, Inc. (AGE) on behalf of A Community of Friends to the Los Angeles Regional Water Quality Control Board (Regional Board) on February 6, 2002, which requested our review and approval of site closure.

We have completed our review of the closure report along with the previously submitted site assessment, periodic monitoring and site closure reports. The following is brief summary of the site history, current site conditions, results of soil and ground water site assessment, and soil remediation activities, conducted at the subject site:

The subject property was previously used by Hollins W.C. Electric and Engineering Company as a transformer manufacturing facility. Lead, total petroleum hydrocarbons (TPH), and PCBs-impacted soil was initially identified by AGE during Phase I and Phase II environmental assessments conducted in 1999. AGE submitted a work plan for the removal of the impacted soil in January 2001.

AGE excavated the three impacted areas in January 2002. The depth of the three excavations extended from approximately 2 to 3 feet below ground surface. Old sewer piping and piping which appeared to be connected to a 550-gallon waste oil underground storage tank were discovered during the excavation of Excavation #1. No piping or other objects were encountered in the other two excavations (Excavation #2 and Excavation #3).

The 550-gallon waste oil underground storage tank discovered on January 17, 2002, at the northeast corner of Excavation #1 was successfully removed and disposed for recycling on January 25, 2002, under City of Los Angeles - Fire Department permit and oversight. Only very low concentrations of gasoline range TPH, Total Recoverable Petroleum Hydrocarbons (heavy -TPH) and toluene were detected in the soil sample collected beneath the removed waste oil storage tank.

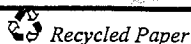
In total, approximately 868 tons of impacted soil was removed from the subject property and transported under hazardous waste manifests to Chemical Waste Management – Kettleman Hills Facility for legal disposal.

The results from the site wide confirmatory soil sampling have confirmed that lead-impacted soil, PCB's-impacted soil, and heavy TPH-impacted soil have been successfully removed. Concentrations of heavy

### California Environmental Protection Agency

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*

\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Ms. Georgina Tamayo  
A Community of Friends

- 2 -

May 7, 2002

TPH in soil samples were either below laboratory detection limits or well below the clean-up level of less than 1,000 mg/kg for heavy TPH.

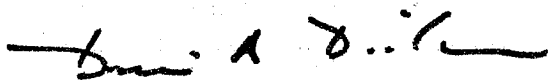
Three borings were drilled to shallow perched ground water underlying the site at approximately 15 feet below ground surface. Based on the analytical results from the grab ground water samples, it is believed that the near surface soil contamination has caused only a minor impact on the shallow perched ground water. Two water supply wells are located in the vicinity of the subject property. These wells are located approximately 0.75 mile and 1.25 miles to the west of the subject property in a hydrogeologically cross-gradient direction.

With the provision that the information and data contained in the reports submitted to this Regional Board are accurate and representative of the site conditions, in conclusion, we have determined that the soil contamination previously encountered at the subject Site had been properly delineated and remediated through excavation and legal disposal to below the specific soil cleanup levels established for the Site consistent with the current Regional Board policies and site assessment and cleanup guidelines. Therefore, no further soil remedial action and ground water monitoring activities are required at this time. However, if contaminated soil is encountered at the site during any future site development activities, you are required to submit a written report to this Regional Board for our review within 72 hours.

We would also like to thank you and your consultant for your full cooperation with this Regional Board in accomplishing the site assessment and soil remediation activity in a timely manner which enables this redevelopment project vital to the local community to be completed without further delay.

If you have any questions concerning the approval of site closure, please feel free to call Dr. Rebecca Chou at (213) 576-6733 or J.T. Liu at (213) 576-6667.

Sincerely,

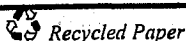


Dennis A. Dickerson  
Executive Officer

cc: Chris Kinne, Cal EPA  
John Hinton, Cal EPA - DTSC  
Arling Alexander, City of Los Angeles Fire Department  
Zachary Feingold, Advanced GeoEnvironmental, Inc.

**California Environmental Protection Agency**

\*\*\*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption\*\*\*  
\*\*\*For a list of simple ways to reduce demand and cut your energy costs, see the tips at: <http://www.swrcb.ca.gov/news/echallenge.html>\*\*\*



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

# UNDERGROUND STORAGE TANK LOW RISK CASE REVIEW FORM

Case reviewer: Jimmie Woo	Unit Chief: Yi Lu	Section Chief: Yue Rong	AEO: David Bacharowski	EO: Tracy Egoscue
Date: 03/26/09	Date: 3/26/09	Date: 3-26-09	Date: 3-20-09	Date: 3/30/09

LUSTIS File No.: 900310361		Investigation and Cleanup Priority: D1	
Site Name/Address: ACS Mission Property 3801 Mission Road Los Angeles, CA 90040	Responsible parties: Mr. Peter Cohen The Cardinal Group LLC	Address: 1875 Century Park East #700 Los Angeles, CA 90031	Phone No.: (310)407-8655

## I. CASE INFORMATION (N/A = Not Applicable)

Tank No.	Size in Gallons	Contents	Closed in-place/Removed/Active?	Date
1-2	1,000	Gasoline	Removed	08/2007
3-4	500	Gasoline	Removed	09/2007

## II. SITE CHARACTERIZATION INFORMATION (GW=groundwater, --- =Not Reported)

GW Basin: Los Angeles Coastal Plain	Beneficial uses: MUN, IND, PROC, & AGR	Depth to drinking water aquifer: 8 to 12 feet bgs (perched)	
Distance to nearest municipal supply well: Well No. 01S12W05G01S is located approximately 14,958 feet from the site.		Vertical Distance between perched GW contamination and aquifer: None	
GW highest depth: 8	GW lowest depth: 12	Well screen interval: 5-35 feet bgs	Flow direction: West-Southwest
Soil types: Silty Clay		Maximum soil depth sampled: 30 feet bgs	

## III. SITE INSPECTION

Pre-closure site inspection: 01/20/09	Is there sensitive receptor next to the site (school, church, hospital, kindergarten etc.)? No If yes, brief description: No
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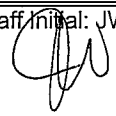
## IV. MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS -- Initial and Latest (ND=Non-detect; NRQ=Not required)

Contaminant	Soil (mg/kg)		EPA SLs*		Soil Screening Levels (mg/kg)**	Water (µg/L)		MCLs/NL (µg/L)
	Initial (01/1989)	Latest (09/2006)	Residential (mg/kg)	Industrial (mg/kg)		Initial (01/1989)	Latest (07/2007)	
TPH (Gas)	ND***	2.9	NE	NE	100	NA	3,000	NE
TPH (Diesel)	NA	NA	NE	NE	100	NA	NA	NE
Benzene	ND***	ND	1.1	5.6	0.044	1.1	71	1
Toluene	0.12***	ND	5,000	46,000	2.3	ND	2.2	150
Ethyl benzene	0.052***	ND	5.7	29	9	ND	15	700
Xylenes	ND***	ND	600	2,600	24.5	15	37	1,750
Methyl tertiary butyl ether (MTBE)	NA	ND	39	190	0.065	NA	ND	13 (Primary) 5 (Secondary)
Di-isopropyl ether (DIPE)	NA	ND	NE	NE	NE	NA	ND	NE
Ethyl tertiary butyl ether (ETBE)	NA	ND	NE	NE	NE	NA	ND	NE
Tertiary amyl methyl ether (TAME)	NA	ND	NE	NE	NE	NA	ND	NE
Tertiary butyl alcohol (TBA)	NA	ND	NE	NE	NE	NA	ND	12 (NL)
Ethanol	NA	NA	NE	NE	NE	NA	NA	NE

\* SLs =USEPA Risk Based Screening Levels (May 2008); (NE=Not Established; NRQ=Not Required; NL=Notification Level)

\*\* Please see the attached table 4 -1

\*\*\* Composite soil sample

Site Name/Address: ACS Mission Property 3801 N. Mission Road Los Angeles, CA 90031	Staff Initial: JW 
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#### V. FREE PRODUCT

Was free product encountered? No	Has free product been totally removed? N/A
When was free product recovery project completed? N/A	

#### VI. SOIL REMEDIATION

Method: None	Duration of remediation: N/A
Waste manifest document: N/A	Volume of soil disposal/mass removal: N/A

#### VII. GROUNDWATER REMEDIATION

Method: None	Duration of remediation: N/A
	Mass removal: N/A

#### VIII. RECOMMENDED ACTION

Soil Closure only: No	Case Closure: Yes	Solvent Case? No
Additional action required (i.e. additional site assessment, remediation, monitoring): N/A		

#### IX. COMMENTS AND JUSTIFICATION FOR RECOMMENDED ACTION

##### Site History

The site formerly consisted of four (two 1,000-gallon gasoline and two 500-gallon gasoline) underground storage tanks (USTs).

In January 1989, four USTs were removed from the site. Two soil borings (Boring 1 and Boring 2) were advanced at the UST farm area. Eleven composite soil samples were collected. Soil samples detected toluene up to 0.12 mg/kg and ethyl benzene up to 0.052 mg/kg. A groundwater sample was collected from Boring 2 at 28 feet bgs, and detected benzene up to 1.1 µg/L and xylenes up to 15 µg/L.

In May 1989, the case was referred from the City of Los Angeles Fire Department to the Regional Board.

In June 2003, two borings (B1 and B2) were drilled to a maximum depth of 25 feet bgs. Soil samples collected from the borings detected TPHg up to 62 mg/kg, benzene up to 0.22 mg/kg, and TBA up to 0.3 mg/kg.

In June 2005, three borings (B4 through B6) were drilled to a maximum depth of 30 feet bgs and converted to groundwater monitoring wells (MW1 through MW3). Soil samples collected from the borings detected TPHg up to 1,100 mg/kg, benzene up to 5 mg/kg, and TBA up to 0.07 mg/kg. Soil analytical data demonstrated a 20-foot "non-detect" zone beneath the site.

In September 2006, three borings (MW4 through MW6) were drilled to a maximum depth of 30 feet bgs and converted to groundwater monitoring wells. Soil samples collected from the borings detected TPHg up to 2.9 mg/kg. No benzene, MTBE, or TBA were detected in the soil samples.

##### Subsurface Lithology

The site is underlain by clay to a depth about 30 feet bgs (the deepest depth investigated).

##### Groundwater Monitoring Summary

Currently, there are six groundwater monitoring wells at the site (MW-1 through MW-6). The wells have been sampled quarterly between July 2005 and July 2007. Historical maximum concentrations of TPHg at 3,300 µg/L, benzene at 250 µg/L, toluene at 8.6 µg/L, ethyl benzene at 15 µg/L, xylenes at 271 µg/L, MTBE at 9.8 µg/L and TBA at 3.6 µg/L were detected in the groundwater samples. Maximum concentrations of TPHg 3,000 µg/L, benzene 71 µg/L, toluene 2.2 µg/L, ethyl benzene 15 µg/L, and xylenes 37.2 µg/L were detected in groundwater samples collected during the most recent sampling event (July 15, 2007). MTBE, TBA, DIPE, ETBE, and TBA were ND. Depth to groundwater is approximately 9 to 11 feet bgs and flow direction is to the southwest.

Site Name/Address:  
ACS Mission Property  
3801 N. Mission Road  
Los Angeles, CA 90031

Staff Initial: JW



## Contaminant Exposure Pathways Evaluation

### Direct Contact

The risk of direct contact is low, since fuel constituents were not detected in the vadose zone above the respective USEPA Risk Based Screening Levels for industrial sites.

### Protection of Drinking Water Aquifer

The residual soil contamination has a low possibility to impact the underlying drinking water aquifer because concentrations of fuel constituents in the soil beneath the site are below the respective Soil Screening Levels (Table 4-1).

### Plume Migration

The residual groundwater plume appears to be stable. Fuel constituents have been detected in well MW-1 only. Downgradient well MW-4 has shown non-detect results.

### Vapor Intrusion

The risk of vapor intrusion from the residual soil contamination is low, since benzene was not detected in soil samples in 2006. Also, benzene concentrations in groundwater are below the Johnson and Ettinger Model (Lite) screening level results (See Target Media Concentration Results).

### Factors Supporting Low Risk Closure

- All USTs were removed in January, 1989.
- Extent of soil and groundwater contamination is defined.
- The nearest production well is 14,958 feet away.
- During the most recent sampling event in July 2007, TPHg and benzene were detected at concentrations (3,000 µg/L and 71 µg/L, respectively). MTBE was non-detect. The residual groundwater plume appears to be stable and localized. Fuel constituents have been detected in well MW-1 only. Downgradient well MW-4 has shown non-detect results.
- The residual soil contamination would not elevate any human health and environmental risks via major pathways, such as direct contact, drinking water ingestion, and vapor intrusion.

## X. MTBE FATE & TRANSPORT PLUME LENGTH MODELING ANALYSIS

MTBE modeling was not performed, since no MTBE was detected.

## XI. ELECTRONIC DELIVERABLE FORMAT (EDF) SUBMISSION

Has electronic data reporting requirement been met? Yes

## XII. AB 681 REQUIREMENT (Land Owner Notification)

Verify property ownership <http://assessor.lacounty.gov/extranet/DataMaps/Pais.aspx> (date) : Yes

Has landowner or impacted site notification requirements been met? Yes

Owner : The Cardinal Group, LLC, Attn: Peter Cohen, 1875 Century Park East, #700, Los Angeles, CA 90067

Responsible party: Same as Owner

Pre-closure letter sent date: N/A

Site Name/Address:  
ACS Mission Property  
3801 N. Mission Road  
Los Angeles, CA 90031

Staff Initial: JW

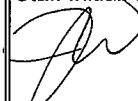


Table 4-1: Maximum Soil Screening Levels (mg/kg) for TPH, BTEX and MTBE above Drinking Water Aquifers

T P H	Distance Above Groundwater	Carbon Range			
		C4-C12	C13-C22	C23-C32	
	>150 feet	1,000	10,000	50,000	
	20-150 feet	500	1,000	10,000	
	<20 feet	100	100	1,000	
B T E X & M T B E	Distance Above Groundwater	Lithology			
		Gravel	Sand	Silt	Clay
	150 feet	B=0.044 T=2 E=8 X=23 MTBE = 0.039	B=0.077 T=4 E=17 X=48 MTBE = 0.078	B=0.165 T=9 E=34 X=93 MTBE = 0.156	B=0.8 T=43 E=170 X=465 MTBE = 0.78
	120 feet	B=0.035 T=1.57 E=6.3 X=17.9 MTBE = 0.028	B=0.058 T=3.1 E=12.7 X=36 MTBE = 0.061	B=0.123 T=7 E=25.9 X=70.3 MTBE = 0.117	B=0.603 T=32 E=128 X=351 MTBE = 0.591
	100 feet	B=0.028 T=1.3 E=5.1 X=14.4 MTBE = 0.020	B=0.046 T=2.57 E=9.86 X=28 MTBE = 0.05	B=0.094 T=5.4 E=20.4 X=55.1 MTBE = 0.091	B=0.471 T=25 E=101 X=276 MTBE = 0.464
	80 feet	B=0.022 T=1 E=4 X=11 MTBE = 0.013	B=0.033 T=2 E=7 X=20 MTBE = 0.039	B=0.066 T=4 E=15 X=40 MTBE = 0.065	B=0.34 T=18 E=73 X=200 MTBE = 0.338
	60 feet	B=0.018 T=0.72 E=2.9 X=7.9 MTBE = 0.013	B=0.026 T=1.4 E=4.9 X=13.9 MTBE = 0.03	B=0.048 T=2.8 E=10.7 X=28.4 MTBE = 0.048	B=0.241 T=13 E=52 X=141.5 MTBE = 0.247
	40 feet	B=0.015 T=0.43 E=1.8 X=4.8 MTBE = 0.013	B=0.018 T=0.87 E=2.8 X=7.8 MTBE = 0.022	B=0.029 T=1.6 E=6.3 X=16.9 MTBE = 0.03	B=0.143 T=7.5 E=30 X=83 MTBE = 0.156
	20 feet	B=0.011 T=0.15 E=0.7 X=1.75 MTBE = 0.013	B=0.011 T=0.3 E=0.7 X=1.75 MTBE = 0.013	B=0.011 T=0.45 E=2 X=5.3 MTBE = 0.013	B=0.044 T=2.3 E=9 X=24.5 MTBE = 0.065

- TPH = Total petroleum hydrocarbons.
- BTEX = benzene, toluene, ethylbenzene, and xylenes, respectively. MTBE = methyl tertiary butyl ether.
- Respective MCLs (ppm): B=0.001, T=0.15, E=0.7, X=1.75, MTBE=0.013.
- BTEX screening concentrations determined per the attenuation factor method as described in RWQCB Guidance for VOC Impacted Sites (March 1996), with a natural degradation factor of 11 for BTEX and of 3 for MTBE. Table values can be linearly interpolated between distance above groundwater and are proportional to fraction of each lithological thickness.
- Values in Table 4-1 are for soils above drinking water aquifers. All groundwaters are considered as drinking water resources unless exempted by one of the criteria as defined under SWRCB Resolution 88-63 (TDS>3000 mg/L, or deliverability <200 gal/day, or existing contamination that cannot be reasonably treated). Regional Board staff will make a determination of potential water use at a particular site considering water quality objectives and beneficial uses. For non-drinking water aquifers, regardless of depth, TPH for ">150 feet" category in the table should be used;
- Distance above groundwater must be measured from the highest anticipated water level. Lithology is based on the USCS scale.
- In areas of naturally-occurring hydrocarbons, Regional Board staff will make determinations on TPH levels.





# Site and Receptor Map



ACS Mission Property  
3801 N. Mission Road  
Los Angeles, CA 90031



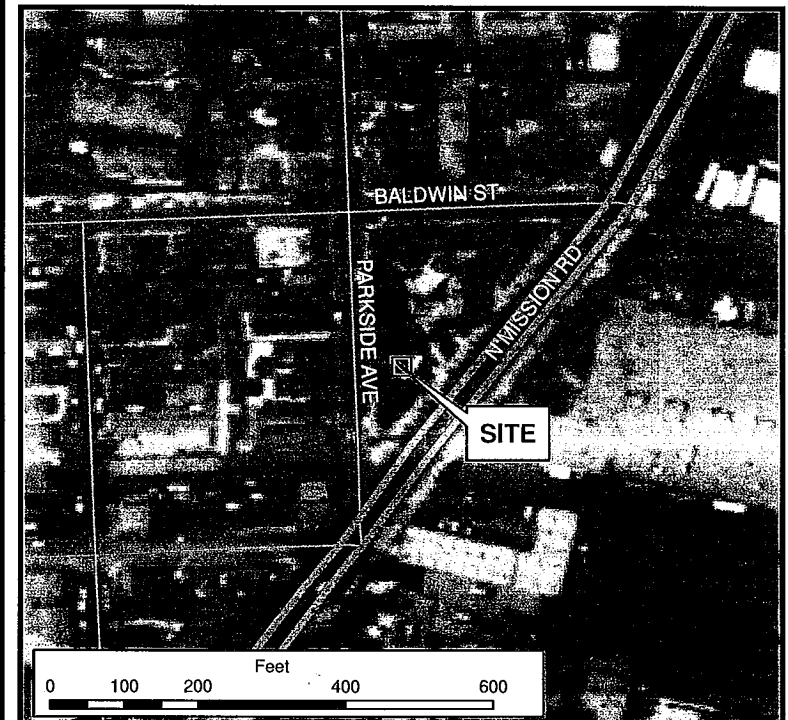
## LUST Case

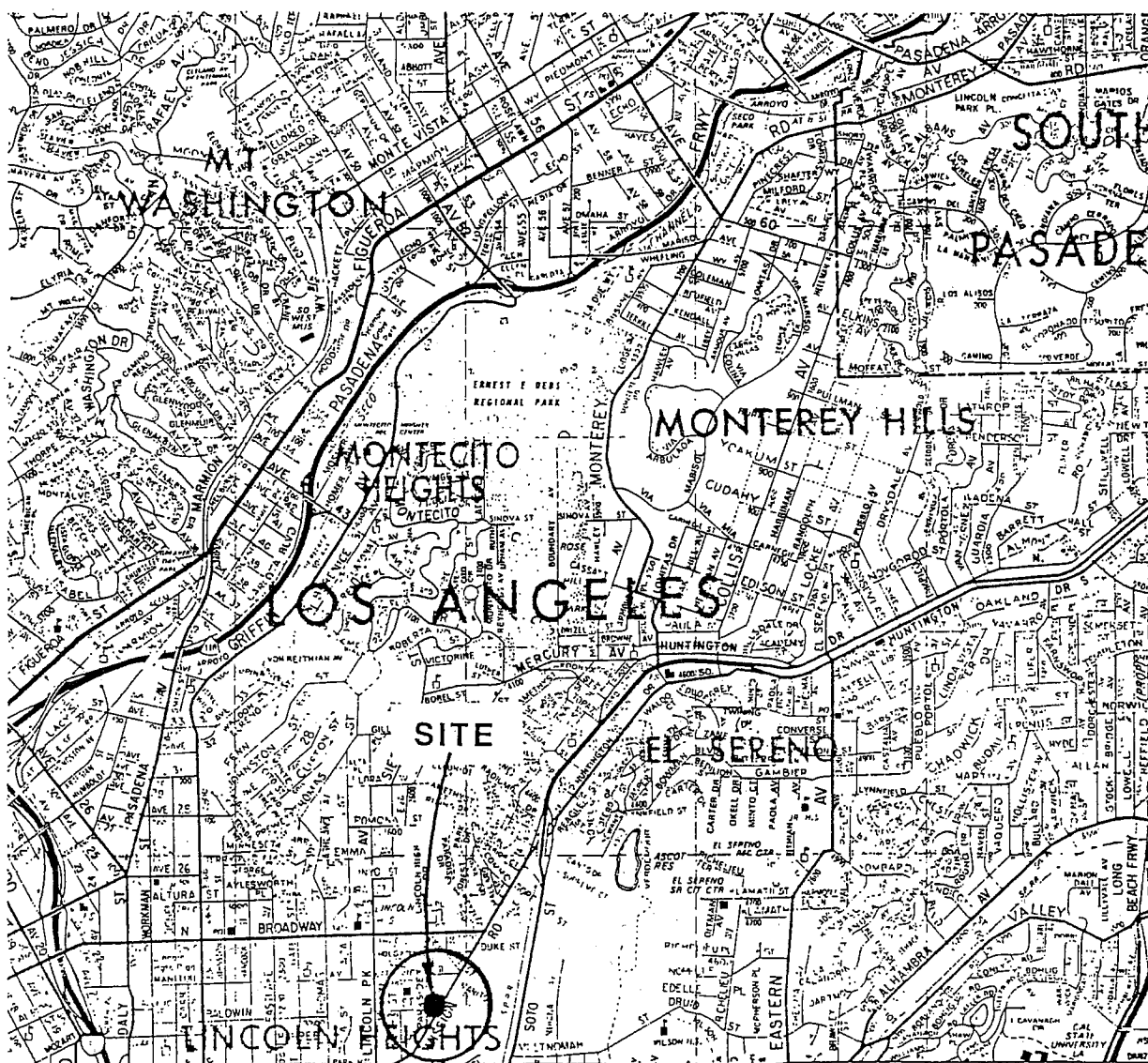
- Active, Local Agency
- Closed, Local Agency
- Active, Regional Board
- Closed, Regional Board
- ⊕ Production Wells
- ▲ Schools

Scale 1:24,000

Feet

0 500 1,000 2,000 3,000 4,000 5,000





**VICINITY MAP**

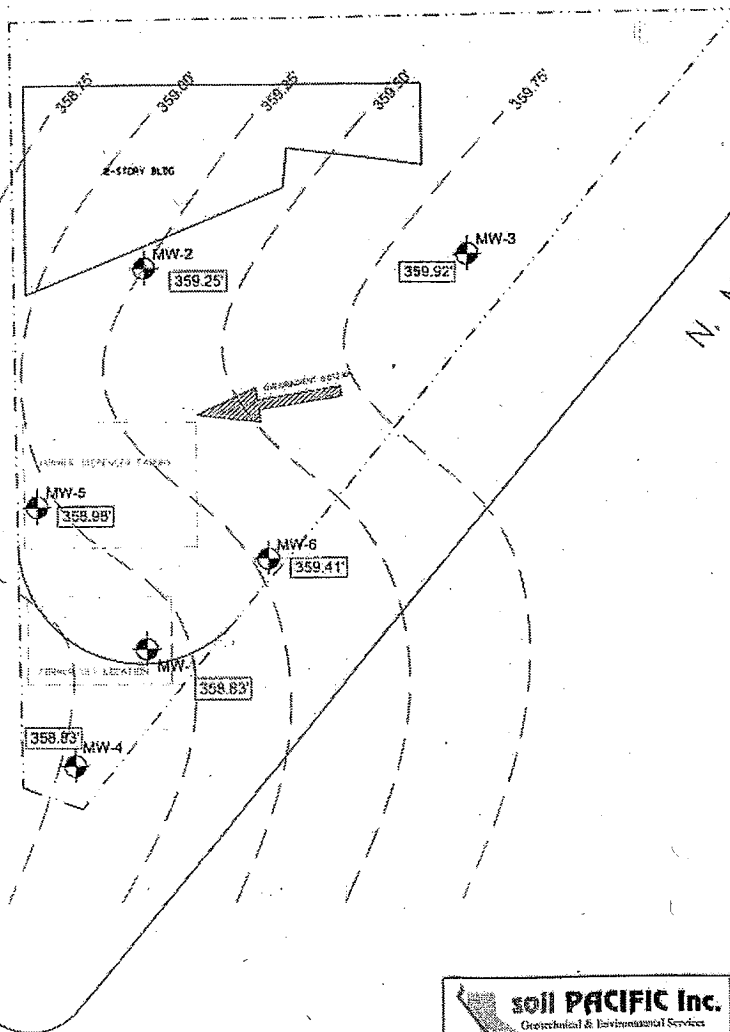
3801 MISSION ROAD  
FILE NO. 18772

SMITH EMERY COMPANY

PLATE NO. A

PARKSIDE AVE

N. MISSION RD



GROUNDWATER MONITORING WELL

358.70'

GROUNDWATER ELEVATION (ft amsl)



GROUNDWATER ISOELEVATION CONTOUR



**soil PACIFIC Inc.**

Geotechnical & Environmental Services

675 N. Eckhardt, Suite # A  
Orange, CA 92668

PROJECT SITE:  
3801 N MISSION RD  
LOS ANGELES, CA 90031

BASE MAP:

DHS & ASSOCIATES, INC.  
45 SOL STICE  
IRVINE, CA 92602  
(714) 665-1580

GROUNDWATER ELEVATION MAP

SCALE: 1"=25'

FIGURE 2

GRAPH BY: L.D.

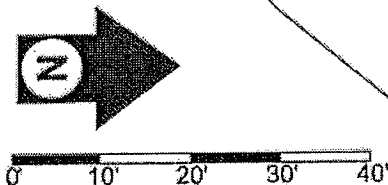
DATE: 8/21/07

PROJECT NO: H-3270-3-07

SHEET 1 OF 1



0' 10' 20' 30' 40'



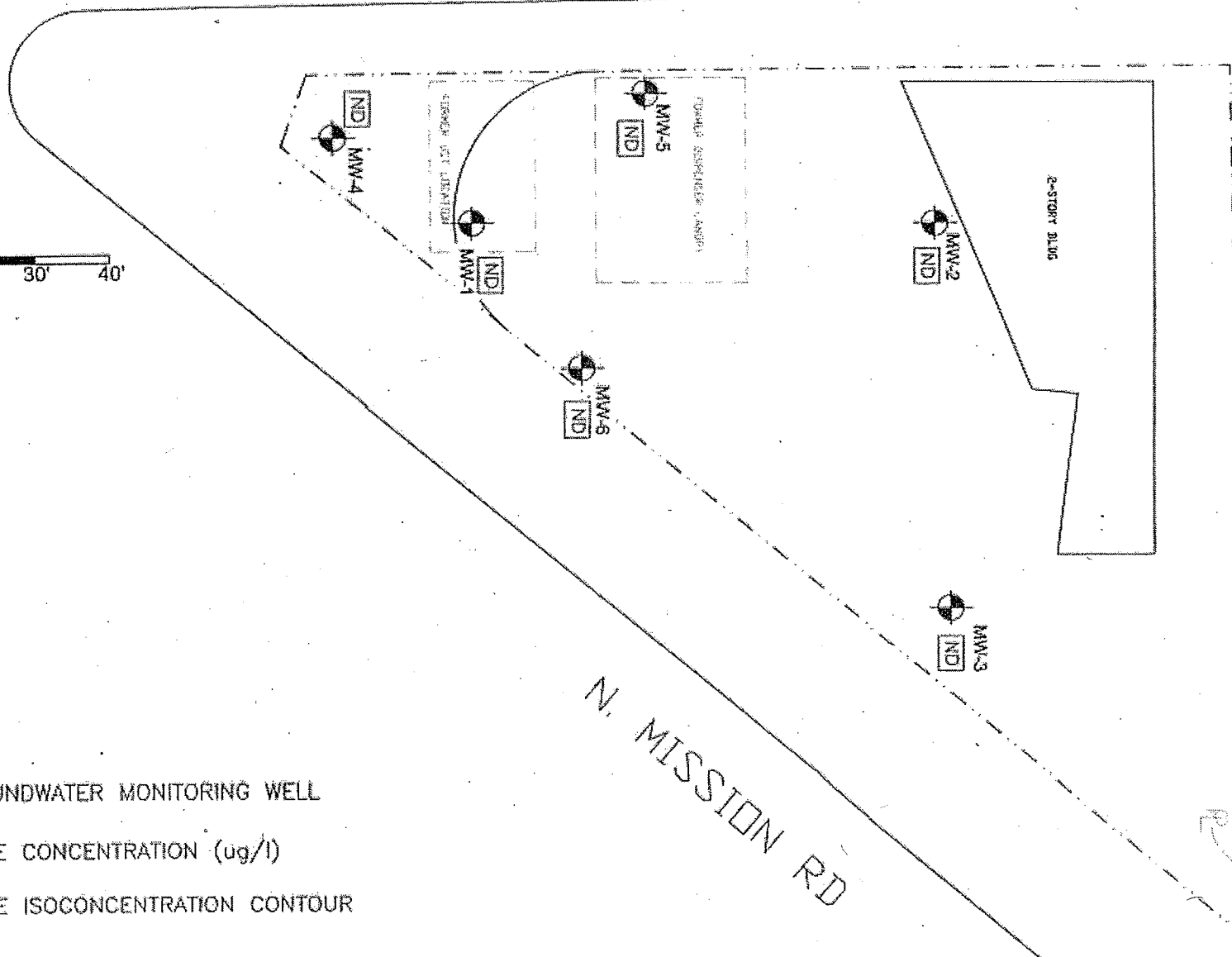
MW-1



GROUNDWATER MONITORING WELL

MTBE CONCENTRATION (ug/l)

MTBE ISOCONCENTRATION CONTOUR



PROJECT SITE:

3801 N MISSION RD  
LOS ANGELES, CA 90031

BASE MAP:

DHS & ASSOCIATES, INC.  
45 SOLSTICE  
IRVINE, CA 92602  
(714) 665-1580

MTBE DISTRIBUTION MAP

SCALE  
DATE: 6/21/07

FIGURE 5

DRAWN BY: L.D.  
REVISED:

PROJECT NO: H-3270-3-07

SHEET 1 OF 1

PARKSIDE AVE

N. MISSION RD

2-STORY BLDG

FORMER DISPENSER STATION

MW-2 (B-5)

MW-3 (B-6)

MW-5

MW-6

B-2

B-3

MW-1 (B-4)

MW-4

A'

A

B-1

SOIL BORING

MW-1

GROUNDWATER MONITORING WELL

LINE OF CROSS SECTION A-A'



0' 10' 20' 30' 40'

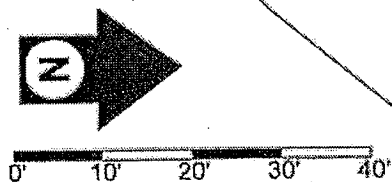


**soil PACIFIC Inc.**  
Geotechnical & Environmental Services  
675 N. Eekhoff, Suite # A  
Orange, CA 92668

PROJECT SITE:  
3801 N. MISSION RD  
LOS ANGELES, CA 90031

DHS & ASSOCIATES, INC.  
45 SOLSTICE  
IRVINE, CA 92602  
(714) 665-1580

SITE PLAN		
SCALE: 1"=20'	FIGURE 3	DRAWN BY: L.D.
DATE: 12/29/06		REVISED:
PROJECT NO: H-3270-SCR-06		
SHEET 1 OF 1		



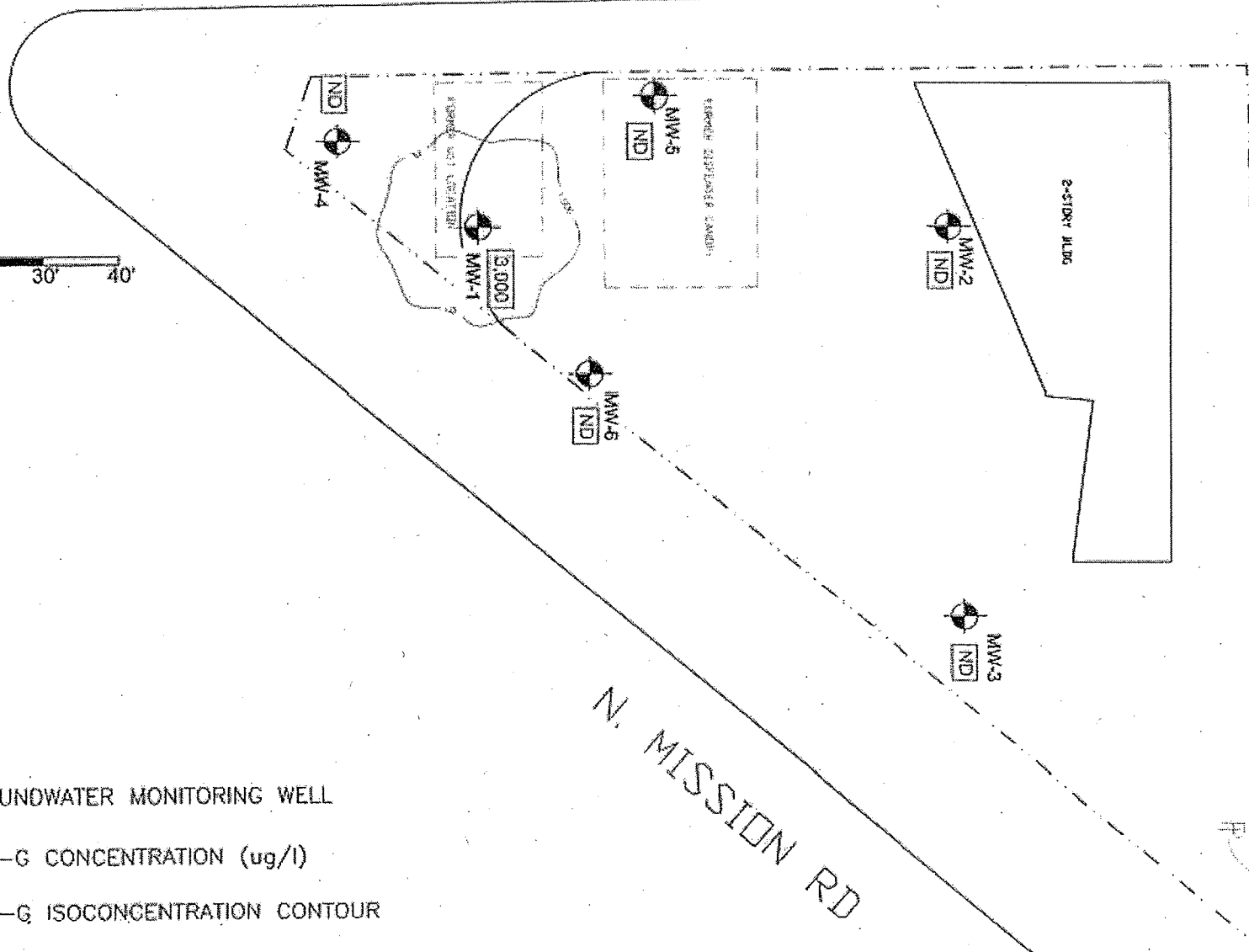
MW-1

220

GROUNDWATER MONITORING WELL

TPH-G CONCENTRATION (ug/l)

TPH-G ISOCONCENTRATION CONTOUR



**soil PACIFIC Inc.**

Geotechnical & Environmental Services

675 N. Eckhoff, Suite # A  
Orange, CA 92668

PROJECT SITE:

3801 N MISSION RD  
LOS ANGELES, CA 90031

BASE MAP:

DHS & ASSOCIATES, INC.  
45 SELSTICE  
IRVINE, CA 92602  
(714) 665-1580

TPH-G DISTRIBUTION MAP

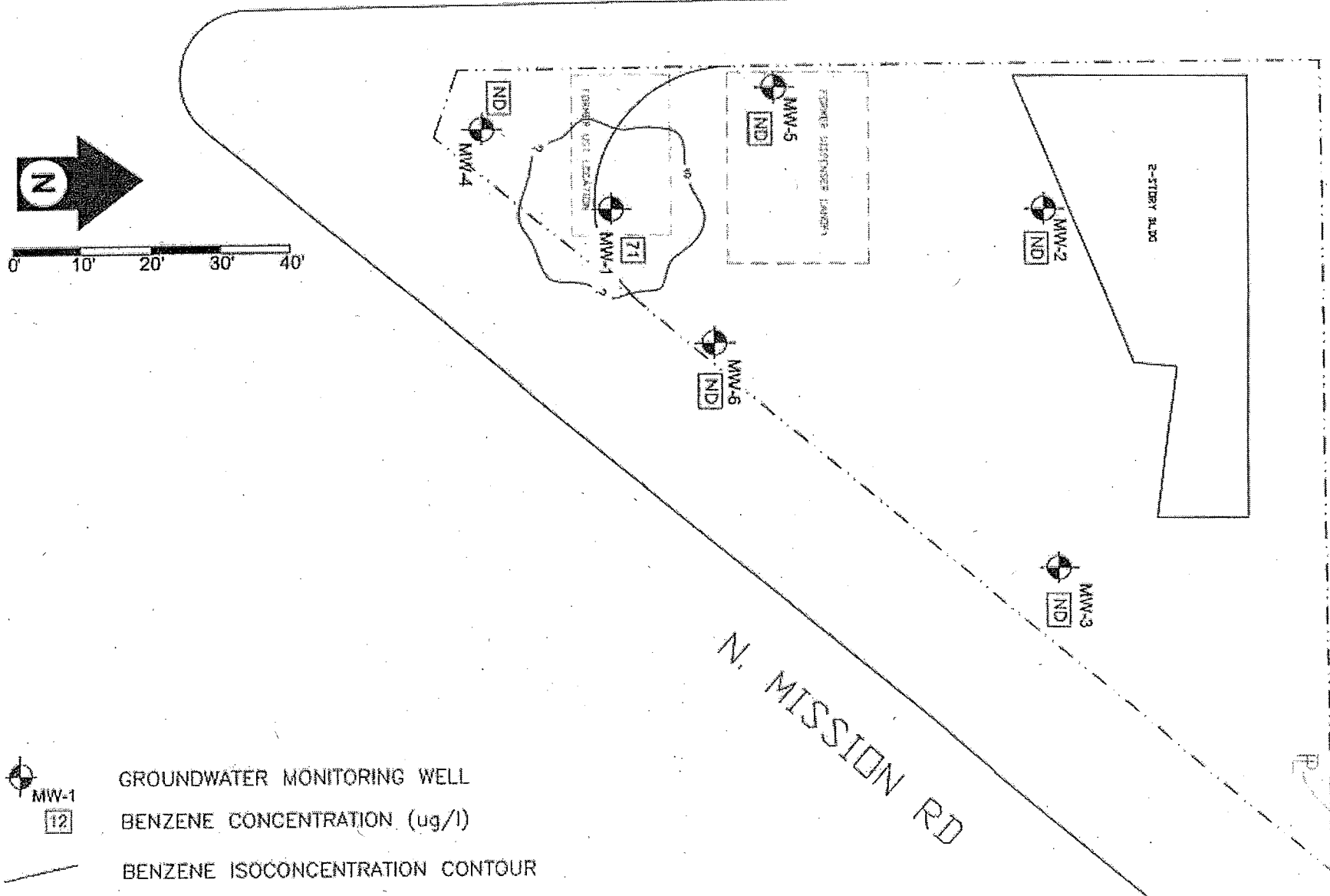
SCALE:  
DATE: 8/23/97


FIGURE 3

DRAWN BY: E.O.  
REVISED:

PROJECT NO: H-3270-3-07

SHEET 1 OF 1



 <b>soil PACIFIC Inc.</b> Geotechnical & Environmental Services  675 N. Eckhoff, Suite # A Orange, CA 92668	PROJECT SITE:		BASE MAP:		BENZENE DISTRIBUTION MAP		
	3801 N MISSION RD		DHS & ASSOCIATES, INC.		SCALE:	FIGURE 4	DRAWN BY: K.D.
	LOS ANGELES, CA 90031		45 SOLSTICE		DATE: 8/21/07		REVISED:
			IRVINE, CA 92602		PROJECT NO: H-3270-3-07		
			(714) 665-1580		SHEET 1 OF 1		

**Table-6**  
**Summary of Historical Groundwater Analytical Results**  
 EPA METHOD 8015M/8260B

Sample ID	Sample Date	TPH-G µg/l	Benzene µg/l	Toluene µg/l	Ethylbenzene µg/l	Xylenes µg/l	MTBE µg/l	DIPE µg/l	TBA µg/l	ETBE µg/l	TAM µg/l
MW-1	7/12/2005	ND	2.82	ND	ND	3.47	ND	ND	ND	ND	ND
	10/18/2006	3,300	250	10	6.9	271	9.8	ND	ND	ND	12
	11/13/2006	900	22	8.6	ND	ND	ND	ND	ND	ND	17
	1/11/2007	220	12	1	1.9	7.5	ND	ND	ND	ND	ND
	3/29/2007	2,400	31	3.1	4.9	33	ND	ND	ND	ND	ND
	5/18/2007	1,200	33	ND	2.9	17.8	ND	ND	ND	ND	ND
	7/31/2007	3,000	71	2.2	15	37.2	ND	ND	ND	ND	ND
MW-2	7/12/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/18/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	11/13/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/11/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	3/29/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	5/18/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	7/31/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-3	7/12/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	10/18/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	11/13/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/11/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	3/29/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	5/18/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	7/31/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4	10/18/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	11/13/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/11/2007	110	2.9	1.7	2.3	5.2	ND	ND	3.6	ND	1.1
	3/29/2007	400	ND	3.3	3.2	3.6	ND	ND	ND	ND	ND
	5/18/2007	260	ND	ND	3.5	ND	ND	ND	ND	ND	ND
	7/31/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5	10/18/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	11/13/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/11/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	3/29/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	5/18/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	7/31/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND



Table-6  
Summary of Historical Groundwater Analytical Results  
EPA METHOD 8015M/8260B

Sample ID	Sample Date	TPH-G <small>µg/L</small>	Benzene <small>µg/L</small>	Toluene <small>µg/L</small>	Ethylbenzene <small>µg/L</small>	Xylenes <small>µg/L</small>	MTBE <small>µg/L</small>	DIPE <small>µg/L</small>	TBA <small>µg/L</small>	ETBE <small>µg/L</small>	TAM <small>µg/L</small>
MW-6	10/18/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	11/13/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	1/11/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	3/29/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	5/18/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
	7/31/2007	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND - Not Detected

**Table-3**  
**Summary of Historical Groundwater Elevation Data**

Well ID	Date	Depth to Water (feet below top of casing)	Well Head Elevation (feet above mean sea level)	Ground Water Elevation (feet above mean sea level)
MW-1	7/12/2005	8.41	366.53	358.12
	10/18/2006	9.00	367.37	357.53
	1/11/2007	9.30		358.07
	3/29/2007	8.67		358.70
	5/18/2007	8.28		359.09
	7/31/2007	8.54		358.83
MW-2	7/12/2005	10.97	369.68	358.71
	10/18/2006	11.60	370.50	358.08
	1/11/2007	11.74		358.76
	3/29/2007	11.32		359.18
	5/18/2007	10.99		359.51
	7/31/2007	11.25		359.25
MW-3	7/12/2005	8.82	368.08	359.26
	10/18/2006	9.25	368.88	358.83
	1/11/2007	9.35		359.53
	3/29/2007	9.02		359.86
	5/18/2007	8.81		360.07
	7/31/2007	8.96		359.92
MW-4	10/18/2006	8.96	367.03	358.07
	1/11/2007	9.12		357.91
	3/29/2007	8.37		358.66
	5/18/2007	7.92		359.11
	7/31/2007	8.20		358.83
MW-5	10/18/2006	10.61	369.13	358.52
	1/11/2007	10.80		358.33
	3/29/2007	10.35		358.78
	5/18/2007	9.85		359.28
	7/31/2007	10.15		358.98
MW-6	10/18/2006	8.55	367.60	359.05
	1/11/2007	8.70		358.90
	3/29/2007	8.33		359.27
	5/18/2007	8.02		359.58
	7/31/2007	8.19		359.41

**Table-3**  
**Groundwater Monitoring Well Data**

<b>Well ID</b>	<b>Installation Date</b>	<b>Well Diameter</b> (inches)	<b>Wellhead Elevation</b> (feet amsl)	<b>Total Depth</b> (feet bgs)	<b>Depth to Screen</b> (feet bgs)	<b>Screen Length</b> (feet)	<b>Slot Size</b> (inches)
MW-1	6/20-21/2005	4	367.37	35	5	30	0.010
MW-2	6/20-21/2005	4	370.50	35	5	30	0.010
MW-3	6/20-21/2005	4	368.88	35	5	30	0.010
MW-4	9/8/2006	4	367.03	27	7	20	0.020
MW-5	9/8/2006	4	369.13	27	7	20	0.020
MW-6	9/8/2006	4	367.60	27	7	20	0.020

MW-2 (B-5)		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	11	
15	62	
20	ND	
25	ND	
30	ND	

MW-5		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	ND	
15	ND	
20	ND	
25	ND	
30	ND	

B-2		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	11	
15	ND	
20	ND	
25	ND	

B-3		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	0.29	
10	782	
15	ND	
20	ND	
25	ND	
30	ND	

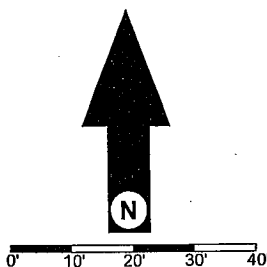
MW-4		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	2.9	
15	ND	
20	0.6	
25	ND	
30	ND	

MW-1 (B-4)		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	1,100	
15	ND	
20	ND	
25	ND	
30	ND	

B-1		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	11	
15	62	
20	ND	
25	ND	

MW-6		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	ND	
15	ND	
20	ND	
25	ND	
30	ND	

MW-3 (B-6)		
SAMPLE DEPTH (feet)	TPH-G (ng/kg)	
5	ND	
10	11	
15	62	
20	ND	
25	ND	
30	ND	



PARKSIDE AVE

N. MISSION RD

2-STORY BLDG

SERVER DISPERSED CANOPY

PERKINS LOT LAYOUT

B-1 SOIL BORING  
MW-1 GROUNDWATER MONITORING WELL

 <b>soil PACIFIC Inc.</b> Geotechnical & Environmental Services 675 N. Eckhoff, Suite # A Orange, CA 92668	PROJECT SITE: 3801 N. MISSION RD. LOS ANGELES, CA 90031	DHS & ASSOCIATES, INC. 45 SOLSTICE IRVINE, CA 92602 (714) 665-1580	SOIL - TPH-G DISTRIBUTION MAP SCALE 1"=20' DATE: 12/29/08 PROJECT NO: H-3270-SCR-06 SHEET 1 OF 1
	FIGURE 4		
	DRAWN BY: LD.		
	REVISED:		

**Table-2**  
**Summary of Historical Soil Analytical Results**  
EPA METHOD 8015M/8260B

Sample ID	Date	TPH-G mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylenes mg/kg	MTBE mg/kg	TBA mg/kg	DIPE mg/kg	ETBE mg/kg	TAM mg/kg
B1-S2 @ 5	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B1-S4 @ 10	6/5/2003	11	ND	ND	ND	ND	ND	0.3	ND	ND	ND
B1-S6 @ 15	6/5/2003	62	ND	ND	ND	ND	ND	0.26	ND	ND	ND
B1-S8 @ 20	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B1-S10 @ 25	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B2-S2 @ 5	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B2-S4 @ 10	6/5/2003	11	0.22	ND	0.0062	0.0092	ND	ND	ND	ND	ND
B2-S6 @ 15	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B2-S8 @ 20	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B2-S10 @ 25	6/5/2003	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B3-1 @ 5	6/20/2005	0.29	ND	ND	ND	ND	ND	0.0691	ND	ND	ND
B3-2 @ 10	6/20/2005	782	4.2	1.46	18.9	83.3	ND	ND	ND	ND	ND
B3-3 @ 15	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B3-4 @ 20	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B3-5 @ 25	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B3-6 @ 30	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B4-1 @ 5	6/20/2005	ND	ND	ND	ND	ND	ND	0.0107	ND	ND	ND
B4-2 @ 10	6/20/2005	1,100	5.06	2	26.1	75.3	ND	ND	ND	ND	ND
B4-3 @ 15	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B4-4 @ 20	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B4-5 @ 25	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B4-6 @ 30	6/20/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-1 @ 5	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-2 @ 10	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-3 @ 15	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-4 @ 20	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-5 @ 25	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B5-6 @ 30	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-1 @ 5	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-2 @ 10	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-3 @ 15	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-4 @ 20	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-5 @ 25	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B6-6 @ 30	6/21/2005	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND - Not Detected

#### 4.0 Laboratory Analysis

Soil samples were submitted to Cal-Tech Laboratories in Paramount, California for analysis of TPH-G by EPA Method 8015M and VOCs and fuel oxygenates by EPA Method 8260B. The analytical results are presented in Table-1. Contaminant distribution for current soil TPH-G data are presented in Figure-4. A copy of the laboratory report and chain-of-custody documentation is presented in Appendix-C.

Confirmation vapor samples were submitted at no charge to our client to Cal-Tech Laboratories in Paramount, California for analysis of TPH-G by EPA Method 8015M and VOCs and fuel oxygenates by EPA Method 8260B. The analytical results are presented in Table-9. A copy of the laboratory report and chain-of-custody documentation is presented in Appendix-C.

Groundwater samples were submitted to Cal-Tech Laboratories in Paramount, California for analysis of TPH-G by EPA Method 8015M and VOCs and fuel oxygenates by EPA Method 8260B. The analytical results are presented in Table-6 (October 18, 2006, collected contemporaneously with high-vacuum extraction) and Table-7 (November 13, 2006, collected after the completion of the 40-day event). Contaminant distribution for current TPH-G, benzene, and MTBE data are shown in Figure-6. A copy of the laboratory report and chain-of-custody documentation is presented in Appendix-C.

#### 5.0 Site Characterization Results

##### 5.1 Soil Analytical Results Discussion

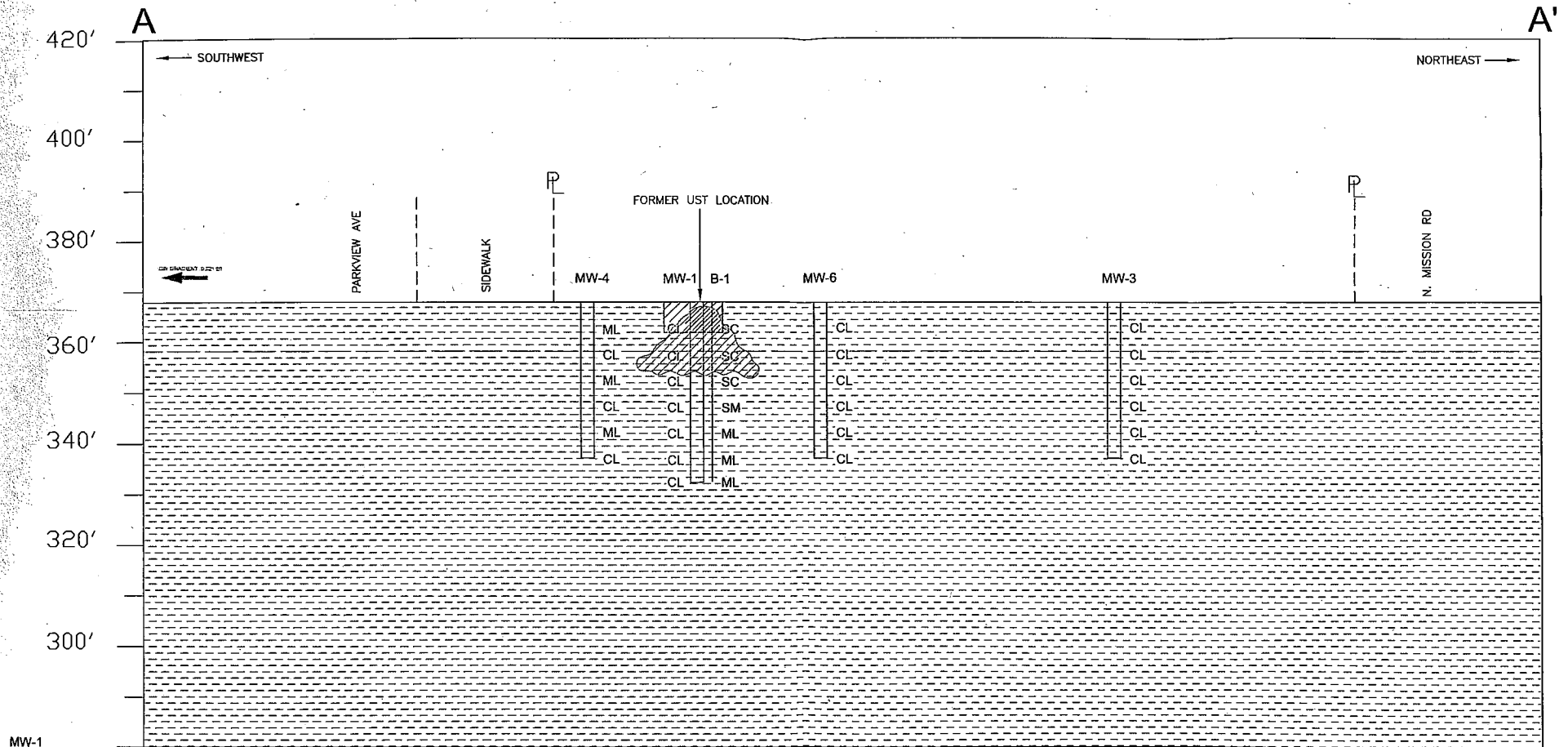
Soil samples were analyzed for TPH-G by EPA Method 8015M and VOCs and fuel oxygenates by EPA Method 8260B. TPH-G was detected at concentrations of 2.9-mg/kg in sample MW-4 @ 10 and 0.6-mg/kg in sample MW-4 @ 15. TPH-G, benzene, toluene, Ethylbenzene, xylenes, and the fuel oxygenates MTBE, TBA, DIPE, ETBE, and TAM were not detected in other soil samples.

Sample ID	Date	TPH-G mg/kg	Benzene mg/kg	Toluene mg/kg	Ethylbenzene mg/kg	Xylenes mg/kg	MTBE mg/kg	TBA mg/kg	DIPE mg/kg	ETBE mg/kg	TAM mg/kg
MW-4 @ 5	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4 @ 10	9/12/2006	2.9	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4 @ 15	9/12/2006	0.6	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4 @ 20	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4 @ 25	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-4 @ 30	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 5	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 10	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 15	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 20	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 25	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-5 @ 30	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 5	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 10	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 15	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 20	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 25	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-6 @ 30	9/12/2006	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

ND - Not Detected

Table-1: Summary of Current Soil Analytical Results

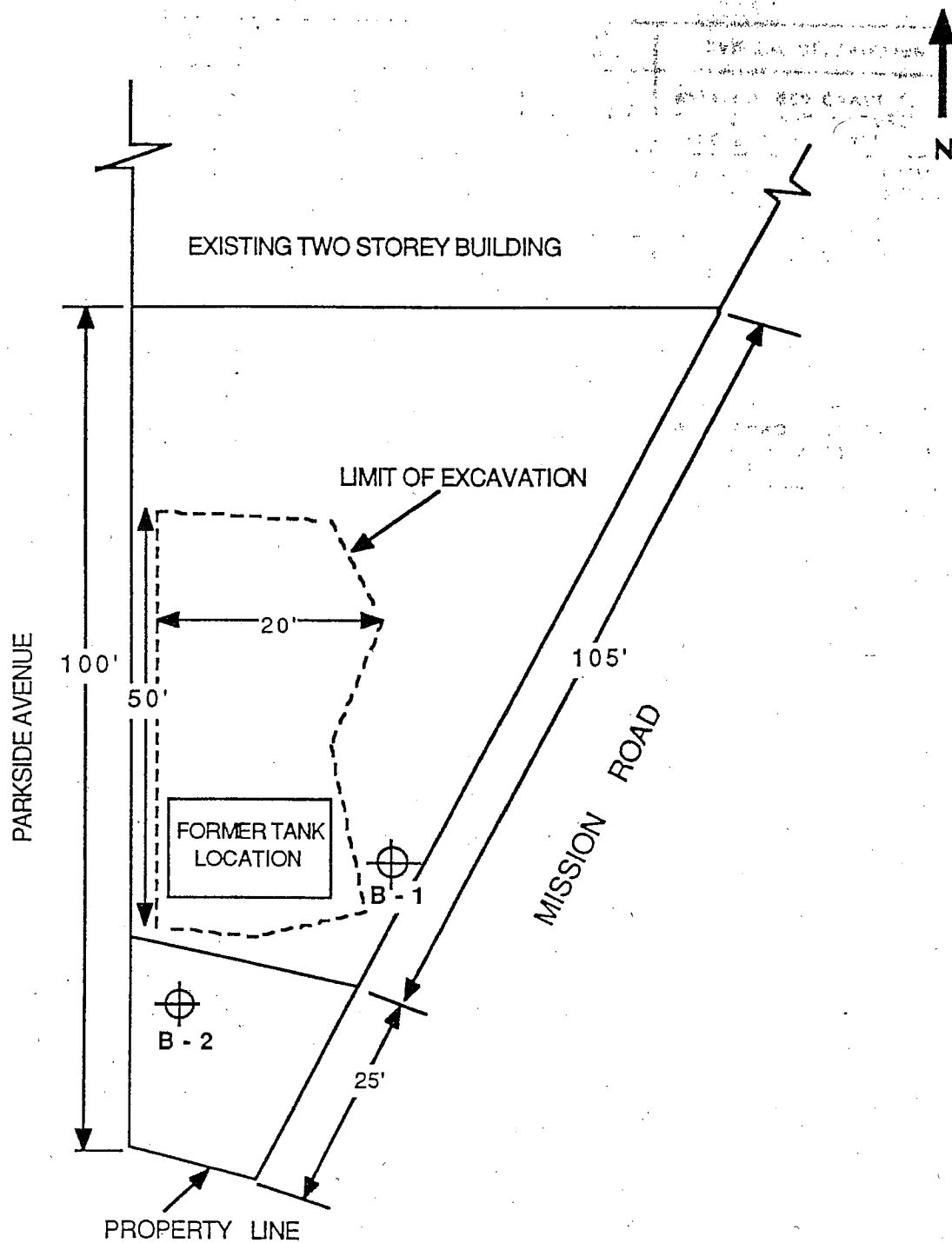
Current and historical soil analytical data indicate that soil in the capillary fringe zone in the vicinity and down gradient of the former UST location was impacted by petroleum hydrocarbon



0' 10' 20' 30' 40'

NO VERTICAL EXAGGERATION

<p><b>soil PACIFIC Inc.</b> Geotechnical &amp; Environmental Services 675 N. Echolt, Suite # A Orange, CA 92668</p>	PROJECT SITE:	DHS & ASSOCIATES, INC.	GEOLOGIC CROSS SECTION A-A'	
	3801 N MISSION RD LOS ANGELES, CA 90031	45 SOLSTICE IRVINE, CA 92602 (714) 665-1580	SCALE: 1"=20'	FIGURE 7
			DATE: 12/29/06	DRAWN BY: LD.
			REVISOR:	PROJECT NO: H-3270-SCR-06
			SHEET 1 OF 1	



LEGEND:

 BORING LOCATION

PLOT PLAN

NOT TO SCALE

3801 MISSION ROAD  
FILE NO. 18772

SMITH EMERY COMPANY

PLATE NO. B



# SMITH-EMERY COMPANY

## Total Petroleum Hydrocarbons (TPH) By EPA 5020/8015 Test Method

<u>Soil Sample</u>	Detection Limit (PPM: Parts Per Concentration <u>Million)</u>		Maximum Allowable TPH <u>Level* (PPM)</u>	
		<u>PPM</u>		
Composite Sample of 5', 10', 15', 20', 25', 30', 35', 40', @ Boring 1	1	Not Detected		100
Composite Sample of 5', 10', 15', 20', 25', 30', 35', 40', @ Boring 2	1	Not Detected		100

## Benzene, Toluene, Xylene and Ethylbenzene (BTX&E) By EPA 5020/8020 Test Method

<u>Compound</u>	Concentration for Composite Soil Sample at Boring 1 (PPM: Parts <u>Per Million)</u>	Concentration for Composite Soil Sample at Boring 2 (PPM)	Detection Limit (PPM)	Maximum Allowable BTX&E Level* (PPM)
Benzene	Not Detected	Not Detected	0.05	0.3
Toluene	0.11	0.12	0.05	0.3
Xylene	Not Detected	Not Detected	0.05	1
Ethylbenzene	0.051	0.052	0.05	1

\* In accordance with State of California Leaking Underground Fuel Tank Task Force.

## SMITH-EMERY COMPANY

Benzene, Toluene, Xylene and Ethylbenzene (BTX&E)  
By EPA 5020/8020 Test Method

<u>Compound</u>	Concentration for Water Sample of 28' at Boring 2 (PPB: Parts Per Billion)	Detection Limit (PPB)	Action Level** (PPB)
Benzene	1.1	0.3	0.7
Toluene	Not Detected	0.5	100
Xylene	15	0.5	620
Ethylbenzene	Not Detected	0.5	680

\*\* In accordance with California Department of Health Services.

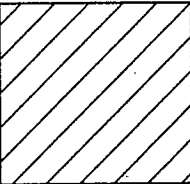
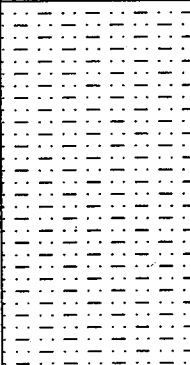
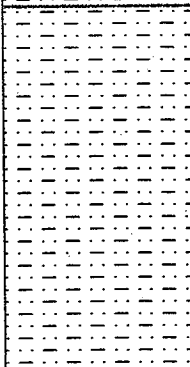
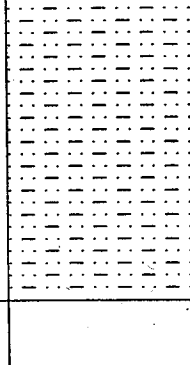
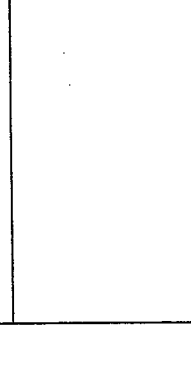

### CONCLUSIONS AND RECOMMENDATIONS

#### Contamination Assessment

It is our conclusion, based on the test results that the total petroleum hydrocarbons and BTX&E concentration in the soil is lower than the actionable levels. However, benzene concentrations in the water exceeds the action level set by the California Department of Health Services. Decontamination and cleaning of this benzene contamination is not within our expertise however, we can recommend firms that are experienced in this field.

DATE OBSERVED: 9-8-06 METHOD OF EXCAVATION: Mobile Hollow Stem

LOGGED BY: Lilly GROUND ELEVATION: Street LOCATION: 3801 Mission Rd., L. A.

DEPTH (FEET)	UNDISTURBED SAMPLE	BLOW COUNTS	DVA (ppm)	USCS Symbols	LAB RESULTS	FORMATION	GRAPHIC LOG	BORING NO. MW-4 DESCRIPTION
						Fill		
5	8-15 -15	0.2	ML			Quaternary Alluvium		Brown, sandy clay, moist
10	3-4	6 1.1	CL					Brown, wet, silty clay
15	7-8 -9	0.2	ML					Groundwater Brown, saturated, silty clay
20	5-6 -7	0.5	CL					Brown, saturated, silty clay
25	20-20 -20	0.1	ML					Brown, saturated, silty clay, hard
30	5-6 -7	0.5	CL					Brown, saturated, silty clay, hard
35								
40								

# TARGET MEDIA CONCENTRATION RESULTS



## Screening-Level Johnson and Ettinger Model

Site Name: ACS Mission Property - 3801 Mission Road, Los Angeles, CA  
Report Date: Thu Feb 5 13:50:16 PST 2009  
Report Generated From: [http://www.epa.gov/athens/learn2model/part-two/onsite/JnE\\_lite.htm](http://www.epa.gov/athens/learn2model/part-two/onsite/JnE_lite.htm)  
Depth to contamination from bottom of foundation: 9ft +/- 4ft  
Average ground water temperature: 20C

### CHEMICAL PROPERTIES

Chemical of Concern: Benzene CAS Number: 71432  
Molecular Weight: 78.11[g/mole] Henrys Constant: 0.1827147 [unitless]  
Diffusivity in Air:  $8.800e-2$  [cm<sup>2</sup>/sec] Diffusivity in Water:  $9.800e-6$  [cm<sup>2</sup>/sec]  
Unit Risk Factor:  $0.0000078$  [( $\mu$ g/m<sup>3</sup>)<sup>-1</sup>] Reference Concentration: 0 [mg/m<sup>3</sup>]

### SOIL PROPERTIES

Soil Type: Sandy Loam Total Porosity: 0.387  
Unsaturated Zone Moisture Content:  
low= 0.039 best estimate= 0.103 high= 0.17  
Capillary Zone Moisture Content: 0.32 Height of Capillary Rise: 0.25 [m]  
Soil-Gas Flow Rate into Building: 5 [L/min]

### BUILDING PROPERTIES

Building Type: Slab-on-Grade Air Exchange Rate:  $0.25$  [hr<sup>-1</sup>]  
Building Mixing Height: 2.44 [m] Building Footprint Area: 100 [m<sup>2</sup>]  
Subsurface Foundation Area: 106 [m<sup>2</sup>] Building Crack Ratio: 0.00038 [unitless]  
Foundation Slab Thickness: 0.1 [m]

### EXPOSURE PARAMETERS

Exposure Duration: carcinogens 30 [years] noncarcinogens: 30 [years]  
Exposure Frequency: carcinogens 350 [days/year] non-carcinogens: 365 [days/year]  
Averaging Time: carcinogens 70 [years] noncarcinogens: 30 [years]  
Risk Factor for carcinogens: 1E-5 Target Hazard Quotient for non-carcinogens: 1

## JOHNSON & ETTINGER SIMULATION RESULTS

### Effective Diffusion Coefficients:

Unsaturated Zone ( $D_{eff}$ ): 0.008884 [cm<sup>2</sup>/s]

Unsaturated Zone + Capillary Zone ( $D_{eff}^T$ ): 0.0008099 [cm<sup>2</sup>/s]

Soil Gas Attenuation Factor ( $\alpha_{sg}$ ): 0.001435

Ground Water Attenuation Factor ( $\alpha_{gw}$ ): 0.000178

Target Concentrations are based on CANCER risk.

Target Indoor Air Concentration: 3.12 [µg/m<sup>3</sup>] or 0.9771 [ppbv]

### <sup>1</sup>Less Protective Target Concentrations

Soil Gas: 6082. [µg/m<sup>3</sup>] or 1905. [ppbv]; Ground Water: 116.2 [µg/L]

### Best Estimate Target Concentrations

Soil Gas: 2174. [µg/m<sup>3</sup>] or 681.0 [ppbv]; Ground Water: 95.91 [µg/L]

### <sup>2</sup>More Protective Target Concentrations

Soil Gas: 1069. [µg/m<sup>3</sup>] or 334.9 [ppbv]; Ground Water: 90.24 [µg/L]

Based on parameter analysis: Advection is the dominant mechanism across foundation. Diffusion through soil is the overall rate-limiting process for groundwater to indoor-air pathway.

<sup>1</sup>"Less Protective" concentrations produced with HIGHEST moisture content and DEEPEST depth to contamination.

<sup>2</sup>"More Protective" concentrations produced with LOWEST moisture content and SHALLOWEST depth to contamination.



# California Regional Water Quality Control Board

## Los Angeles Region



Linda S. Adams  
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.waterboards.ca.gov/losangeles>

Arnold Schwarzenegger  
Governor

March 30, 2009

Mr. Peter Cohen  
The Cardinal Group, LLC  
1875 Century Park East #700  
Los Angeles, CA 90031

**UNDERGROUND STORAGE TANK PROGRAM – CASE CLOSURE  
ACS MISSION PROPERTY  
3801 MISSION ROAD, LOS ANGELES, CA (FILE NO. 900310361; D-1 SITE)**

Dear Mr. Cohen,

This letter confirms the completion of a site investigation and corrective action for the underground storage tank(s) formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tank(s) are greatly appreciated.

Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground tank(s) site is in compliance with the requirements of subdivision (a) and (b) of section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to section 25299.3 of the Health and Safety Code and that no further action related to the petroleum release(s) at the site is required.

This notice is issued pursuant to subdivision (g) of section 25296.10 of the Health and Safety Code.

If you have groundwater monitoring wells or vapor extraction wells at the subject property, you must comply with the following:

1. All wells must be located and properly abandoned.
2. Well abandonment permits must be obtained from the Los Angeles County Department of Public Health, Environmental Health Division, and all other necessary permits must be obtained from the appropriate agencies prior to the start of work.
3. You must submit a report on the abandonment of the wells to this office by **June 27, 2009**. This report must include, at a minimum, a site map, a description of the well abandonment process, and copies of all signed permits.

**California Environmental Protection Agency**



Recycled Paper

*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*

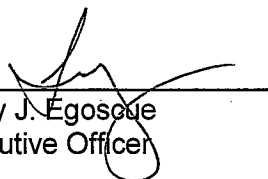
Mr. Peter Cohen  
ACS Mission Road

- 2 -

March 30, 2009

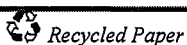
Please contact Mr. Yi Lu at (213) 576-6695 or e-mail [ylu@waterboards.ca.gov](mailto:ylu@waterboards.ca.gov), or Jimmie Woo at (213) 576-6698 or e-mail at [jwoo@waterboards.ca.gov](mailto:jwoo@waterboards.ca.gov), if you have any questions regarding this matter.

Sincerely,

  
Tracy J. Egosque  
Executive Officer

cc: Yvonne Shanks, State Water Resources Control Board, UST Cleanup Fund  
Lilly Lee, State Water Resources Control Board, UST Cleanup Fund  
Nancy Matsumoto, Water Replenishment District of Southern California  
Frank Comfort, City of Los Angeles – Fire Department, Environmental Unit  
Yones Kabir, Soil Pacific Inc.

***California Environmental Protection Agency***



*Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.*