



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date: March 13, 2025
Time: After 8:30 a.m.
Place: Los Angeles City Hall
Council Chamber, Room 340
200 North Spring Street
Los Angeles, CA 90012

The meeting's telephonic number and access code number will be provided no later than 72 hours before the meeting on the meeting agenda published at [Commissions, Boards, and Hearing – 12/12/2024 City Planning Commission](#) and/or by contacting cpc@lacity.org.

CEQA Case No.: ENV-2020-3533-EIR
Related Cases: CPC-2016-1208-CU-SPR and AA-2017-397-PMEX
Council No.: 11 – Park
Plan Area: Palms-Mar Vista-Del Rey
Plan Overlay: N/A
Certified NC: Del Rey Neighborhood Council
Existing GPLU: Light Manufacturing
Existing Zone: M2-1
Applicant: NSB Associates, Inc.
Representative: Clare Bronowski, Rand, Paster & Nelson, LLP

Public Hearing: Pursuant to CEQA Guidelines 15202, a public hearing is not required.

Appeal Status: Appealable to City Council

Expiration Date: Not Applicable

Multiple Approvals: No

PROJECT LOCATION: 12531-12575 West Beatrice Street and 5410-5454 South Jandy Place, Los Angeles, CA 90066

PROPOSED PROJECT: The Project proposes the demolition of an existing 23,072 square-foot office building and two accessory buildings, totaling 7,188 square feet; the retention of an 87,881 square-foot office building; and the construction of a new eight-story office building with up to 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. Upon completion, the Project would total 287,381 square feet of floor area on an approximately 4.5-acre site, with a Floor Area Ratio (FAR) of 1.46:1. The new office building would include three above-grade and two subterranean levels of parking (additional parking would be provided in the surface parking lot adjacent to the existing office building located at 12541 West Beatrice Street) and would have a maximum building height of 135 feet to the top of the parapet.

In August 2017, the City Planning Commission (CPC) adopted the Project's mitigated negative declaration (MND) (Case No. ENV-2016-1209-MND) and approved a Conditional Use Permit for a Major Development Project and Site Plan Review (Case No. CPC-2016-1208-CU-SPR). In June 2018, the Deputy Advisory Agency (DAA) approved the Project's Lot Line Adjustment (Case No. AA-2017-397-PMEX) to the boundary lines between three legal lots under the same ownership. These decisions were subsequently appealed by an aggrieved party. In February 2018, the City Council denied the appeals of the Conditional Use Permit and Site Plan Review, sustaining the actions of the CPC; and, in November 2018, the CPC denied the appeal of the Lot Line Adjustment and sustained the action of the DAA. Petitions were filed against the City's approvals and in January 2020, the Los

Angeles County Superior Court vacated the City's approval of the Project's MND, and required an Environmental Impact Report (EIR) be prepared for the Project, but did not invalidate the Project's underlying land use approvals.

The Project's EIR was prepared pursuant to the judgement in *Karney Management v. City of Los Angeles* (Case No. BS172677, consolidated with Case No. 18STCP03226) and is being presented for the CPC's consideration.

**REQUESTED
ACTIONS:**

ENV-2020-3353-EIR

1. Pursuant to Section 21082.1(c)(3) of the California Public Resources Code (PRC), the consideration and certification of the Environmental Impact Report (EIR), ENV-2020-3533-EIR, SCH No. 2020120119, for the above-referenced project, and Adoption of the Statement of Overriding Considerations setting forth the reason and benefits of adopting the EIR with full knowledge that significant impacts may remain;
2. Pursuant to Section 21081.6 of the California PRC, the adoption of the proposed Mitigation Measures and the Mitigation Monitoring Program; and
3. Pursuant to Section 21081 of the California PRC, the adoption of the required Findings of the certification of the EIR.

**RECOMMENDED
ACTIONS:**

ENV-2020-3533-EIR

1. Find, that the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report No. ENV-2020-3353-EIR (SCH No. 2020120119), dated January 2024, the Final EIR, dated February 2025, and the Erratum dated February 2025 (collectively, New Beatrice West Project EIR), as well as the whole of the administrative record.

CERTIFY that:

- a. The New Beatrice West Project EIR has been completed in compliance with the California Environmental Quality ACT (CEQA);
- b. The New Beatrice West Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency; and
- c. The New Beatrice West Project EIR reflects the independent judgment and analysis of the lead agency.

ADOPT the following:

- a. The related and prepared New Beatrice West Project Environmental Findings;
- b. The Statement of Overriding Considerations; and
- c. The Mitigation Monitoring Program prepared for the New Beatrice West Project EIR.

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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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- C – AA-2017-397-PMEX-1A LOD
- D – Mitigation Monitoring Program
- E– Beatrice Project EIR PDFs/MMs and 2017 LOD Conditions of Approval

Environmental Impact Report (EIR) links:

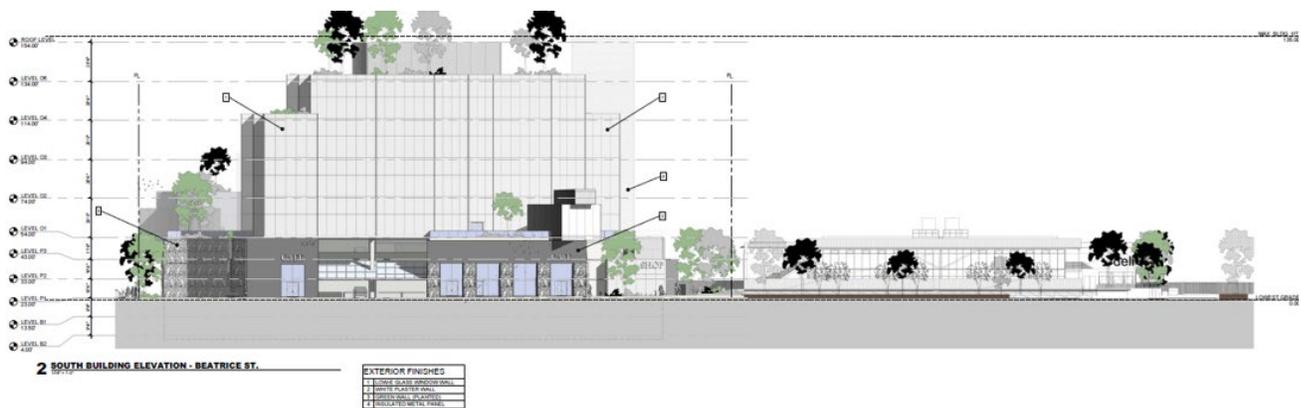
- Initial Study: <https://planning.lacity.gov/development-services/eir/new-beatrice-west-project>
- Draft EIR: <https://planning.lacity.gov/development-services/eir/new-beatrice-west-project-0>
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PROJECT ANALYSIS

PROJECT SUMMARY

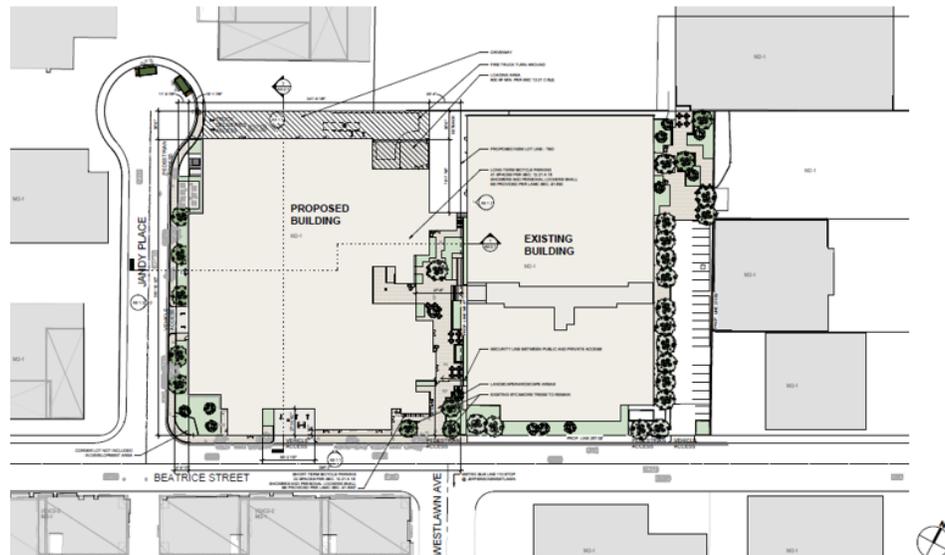
The Project Site is currently developed with an 87,881 square-foot two-story office building and surface parking on the eastern portion of the site; and a 23,072 square-foot one-story office building and two accessory buildings, totaling 7,188 square feet on the western portion of the site. The two buildings are separated with a central surface parking area. The New Beatrice West Project (Project) proposes to retain the existing office building on the eastern portion of the site and demolish all remaining structures and remove the central surface parking lot, to accommodate the construction of a new, eight-story office building with ground floor commercial space and parking provided within two subterranean levels and three above-grade levels and a surface parking lot.

The new office building would include 196,100 square feet of office space and 3,400 square feet of ground floor commercial space, for a total of 199,500 square feet. The new office building would have a maximum height of 135 feet to the top of the parapet (155 feet to the top of the mechanical housing for the elevator). In conjunction with the existing office building to remain, the total floor area would be 287,381 square feet on a 4.51-acre site, resulting in a FAR of 1.46:1. The new office building’s southern façade (fronting Beatrice Street), as well as the existing two-story office building to be retained, are shown in the elevation below.



Beatrice Street Elevation of New 8-Story Office Building and Existing 2-Story Office Building

The Project would include 31,232 square feet of landscaped area and 54,583 square feet of hardscaped amenity areas throughout the site, including a new ground floor central courtyard serving as a connection between the existing and new office buildings. Another ground-floor outdoor amenity space would be provided at the northeast corner of the site, adjacent to the existing office building. Levels 4 through 8 of the new office building would include landscaped and hardscaped terraces accessible to tenants. Additionally, street trees would be planted along Jandy Place along with a new landscaped buffer.



New 8-Story Office Building and Existing 2-Story Office Building Site Plan

BACKGROUND

On August 18, 2017, the City Planning Commission approved the New Beatrice West Project, adopted the Project's mitigated negative declaration (MND) (Case No. ENV-2016-1209-MND) and approved a Conditional Use Permit for a Major Development Project and a Site Plan Review (Case No. CPC-2016-1208-CU-SPR). The decision was appealed by Karney Management Group, the manager and owners' representative of the properties located immediately to the west and south of the Project Site. On February 7, 2018, the City Council denied the appeal and sustained the actions of the City Planning Commission, adopting the Project's MND and approving the entitlements.

On June 7, 2018, the Advisory Agency approved an associated lot line adjustment to the boundary lines between three legal lots under the same ownership (Case No. AA-2017-397-PMEX). The decision was appealed by the same party. On November 19, 2018, the City Planning Commission denied the appeal and sustained the actions of the Deputy Advisory Agency.

Following the final decisions on the Project's entitlements, petitions were filed against the City's approvals of the Project, on the grounds, among others, that the City's MND was inadequate under the California Environmental Quality Act (CEQA) (*Karney Management v. City of Los Angeles*, Case No. BS172677 [Consolidated with Case No. 18STCP03226]). The court ruled that the Project's MND was inadequate in regards to its analysis and disclosure of the Project's impacts related to aesthetics, noise, and traffic. On January 21, 2020, the court entered a judgment granting the petition for writ of mandate as to the CEQA cause of action and denying the remainder of the causes of action. The judgment vacated the City's approval of the Project's MND and required that an EIR be prepared for the Project. However, the judgment did not invalidate the Project's underlying approvals (Case Nos. CPC-2016-1208-CU-SPR and AA-2017-397-PMEX). As such, the existing Project entitlements (Project Approvals) remain valid.

The City has prepared an EIR to analyze the Project pursuant to the judgment and in compliance with CEQA. The EIR analyzed the Project in the environmental baseline context existing prior to the adoption of any Project approvals or entitlements by the City. Thus, all potential environmental impacts of the Project's discretionary approvals have been analyzed in the prepared EIR.

ENVIRONMENTAL IMPACT REPORT

The following is a summary of the environmental review process and final impacts resulting from the Project. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse (SCH), Governor's Office of Land Use and Climate Change (formerly the Governor's Office of Planning and Research), responsible agencies, owners and occupants within a 500-foot radius of the Project Site, and interested parties on December 8, 2020, for a 30-day review period. An Initial Study is a preliminary analysis conducted to determine whether a proposed project has the potential to cause significant environmental impacts, and acts as a screening tool to identify potential environmental concerns to be studied in further detail in a Draft EIR.

A Draft EIR was then subsequently prepared, which identified and analyzed the potential significant environmental impacts of the proposed Project (including impacts related to aesthetics, noise, and traffic, among others), and presented mitigation measures and feasible alternatives to lessen or avoid potential impacts. Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the SCH and circulated for public review, commencing on January 4, 2024, and ending on February 20, 2024, for a total review period of 47 days. The Draft EIR was also made available for review on the City's website, at the Department of City Planning, and at three public libraries.

Following the Draft EIR public comment period, the Final EIR was prepared to address and evaluate public comments and concerns raised during the public review of the Draft EIR, to incorporate any necessary revisions to the Draft EIR, and to present the Project's Mitigation Monitoring Program. A total of five Draft EIR comments were received: two from agencies (Caltrans and the City of Los Angeles Sanitation Department), two from law firms on behalf of unions, and one from an individual. The comments focused on the project impacts related to air quality, greenhouse gas emissions, hazardous materials, noise, transportation, and utilities. The Final EIR was made available on February 24, 2025. The Final EIR Notice of Availability was sent to all interested parties and anyone who commented on the Initial Study and/or Draft EIR.

The Environmental Impact Report identified impacts that would have 1) no impacts or less than significant impacts, 2) potential significant impacts that could be mitigated to less than significant, and 3) impacts that remain significant and unavoidable even after implementing all feasible mitigation measures.

Impacts found to be less than significant after mitigation include impacts to:

Archaeological Resources

The Project site has been subject to grading and development in the past and based on the records search at the South Central Coastal Information Center (SCCIC), no archaeological resources have been found at the Project site, thus any new archaeological survey is unlikely to observe surface artifacts. However, as indicated in the SCCIC records search, the Project site vicinity is potentially sensitive for archaeological resources. Since the Project would include excavation to previously undisturbed depths, there is potential for archaeological materials to be discovered during construction activities associated with the Project. Therefore, impacts to archaeological resources would be potentially significant. Mitigation Measure CUL-MM-1 would require a qualified archaeologist to perform on-site periodic inspections of excavation and grading activities. If archaeological materials are encountered, the archaeologist shall assess the material and prepare a report evaluating the impacts. The Applicant shall comply with the

recommendations in the report. With the implementation of Mitigation Measure CUL-MM-1, impacts would be reduced to less than significant.

Paleontological Resources

Similar to archaeological resources, there are no previously encountered fossil vertebrate localities located within the Project site. However, due to the Project's excavation to previously undisturbed depths, the possibility exists that paleontological artifacts that were not discovered during prior construction and other human activity on the Project site may be encountered during Project excavation activities. As such, impacts to paleontological resources would be potentially significant. Mitigation Measure GEO-MM-1 would require a paleontologist to perform periodic on-site inspections of excavation and grading activities. If paleontological materials are encountered, the paleontologist shall assess the material and prepare a report evaluating the impacts. The Applicant shall comply with the recommendations in the report. With the implementation of Mitigation Measure GEO-MM-1, impacts would be reduced to less than significant.

Transportation - Vehicle Miles Travelled (VMT)

Project-level impacts with respect to conflicts with CEQA Guidelines Section 15064.3(b) were determined to be potentially significant without mitigation, as the Project would result in a daily work VMT per employee of 12.4, which would exceed the daily work VMT per employee threshold of 11.1 for the West Los Angeles Area Planning Commission (APC) area. Mitigation Measure TR-MM-1 would require the Project to prepare a Transportation Demand Management Plan to be approved by LADOT prior to the issuance of a certificate of occupancy. With the implementation of Mitigation Measure TR-MM-1, the daily work VMT per employee would be reduced to 10.3. Therefore, impacts would be less than significant after implementation of feasible mitigation.

Impacts found to be significant and unavoidable after mitigation include impacts to:

Noise (Construction On-Site Noise)

The significance criterion used to determine significant construction noise impacts is whether Project-related construction noise would exceed the ambient exterior noise levels by 5 dBA (hourly Leq) or more at a noise-sensitive use. The estimated construction-related noise would exceed the significance criterion at receptor locations R1, R3, and R5. The estimated construction-related noise would exceed the significance threshold by a range of 2.6 dBA at receptor location R3 to up to 26.9 dBA at receptor location R5. Therefore, the Project's temporary noise impact associated with the Project's on-site construction would be potentially significant. The Project will implement Project Design Feature PDF-NOI-1, which will require noise reducing best management practices for construction equipment. In addition, implementation of Mitigation Measure NOI-MM-1 to install temporary sound barriers would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by on-site construction activities at the off-site noise-sensitive uses, by up to 15 dBA at receptor locations R1 and R5 and by up to 5-dBA at R3. Implementation of Mitigation Measure NOI-MM-1, which offers a 5-dBA noise reduction at receptor location R3 would, therefore, reduce the noise impacts at receptor location R3 to a less-than-significant level. However, even with implementation of NOI-MM-1, the estimated construction-related noise levels would still continue to exceed the significance thresholds at receptor locations R1 (apartments), by 7.9 dBA, and R5 (studios), by 11.9 dBA. There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from on-site construction at

receptor locations R1 and R5. Therefore, the Project's construction noise impact associated with on-site noise sources would be significant and unavoidable.

Noise (Construction Off-Site Noise)

The hourly noise levels generated by Project construction trucks would exceed the significance criterion of a 5-dBA increase over the ambient noise level along Beatrice Street (by 5.4 Leq [dBA]), Westlawn Avenue (by 4.8 Leq [dBA]) and Grosvenor Boulevard (by 4.2 Leq [dBA]), during the grading/excavation, foundation, and building construction phases. Therefore, the Project's temporary noise impacts associated with off-site construction traffic would be potentially significant.

Additionally, improvements required for specified fire flows will require off-site construction activities that would involve a limited number of construction equipment, which would comply with Project Design Feature NOI-PDF-1 (noise reducing best management practices). Noise levels associated with the potential water infrastructure improvements would range from 62.7 dBA (L_{eq}) at the residential receptor location R3 (located along Westlawn Avenue) to 79.6 dBA (L_{eq}) at the residential receptor location R1 (located along Beatrice Avenue) should the City determine that infrastructure improvements are needed near these locations based on the requisite fire flow. The estimated noise levels at the residential uses on the east side of Grosvenor Boulevard (receptor location R2) would be approximately 68.6 dBA (L_{eq}). Noise levels associated with the potential water infrastructure improvements at these locations would be equal to or less than the estimated noise levels from the on-site construction activities that would already be occurring and, similarly, construction-related noise levels during Project construction would continue to exceed the 5-dBA significance threshold. Therefore, the Project's temporary noise impacts associated with the off-site water improvements would be potentially significant.

The short-term noise impacts associated with off-site construction traffic would be significant along nearby segments of Westlawn Avenue, Beatrice Street and Grosvenor Boulevard due primarily to noise from construction trucks along the haul route prior to reaching Jefferson Boulevard. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls, would not be feasible as the barriers would obstruct vehicular and pedestrian access, as well as visibility to the properties along these street segments and would extend for a significant distance on city streets until the haul trucks reach Jefferson Blvd. Therefore, the Project's construction noise impact associated with off-site construction traffic would be significant and unavoidable.

Implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by off-site construction activities at the adjacent noise-sensitive uses by a minimum 10-dBA at receptor location R1, 8-dBA at receptor location R2, and 5-dBA at receptor location R3; however construction-related noise levels would still exceed the significance thresholds at receptor location R1 with the implementation of Mitigation Measure NOI-MM-1 as temporary moveable noise barriers are typically limited to a 10-dBA noise reduction (unlike a fixed barrier which can achieve a noise reduction of up to 15-dBA). There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from off-site construction at receptor location R1. Therefore, the Project's off-site construction-related noise impacts would be significant and unavoidable.

Noise (Construction On-Site Vibration [Human Annoyance])

Per FTA guidance, the significance criteria for vibration impacts related to human annoyance is 72 VdB for sensitive uses, including residential uses, and 65 VdB for recording studio uses. The estimated ground-borne vibration levels at receptor locations R1 and R5 would exceed the 72-VdB and 65-VdB significance criteria, respectively. Therefore, on-site vibration impacts during construction of the Project, pursuant to the significance criteria for human annoyance, would be potentially significant. Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall of sheet piles installed into the ground (essentially a subterranean sound barrier to reduce noise). To be effective, however, wave barriers must typically be very deep and long, rendering them cost prohibitive and infeasible for temporary applications such as construction. Constructing a wave barrier would also generate the same ground-borne vibration that is sought to be mitigated. Thus, there are no feasible mitigation measures to reduce construction-related human annoyance impacts from on-site ground-borne vibration, and impacts would be significant and unavoidable.

Noise (Construction Off-Site Vibration [Human Annoyance])

To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul routes were assumed to be within 25 feet of the sensitive uses, including residential uses along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard; and recording studio uses along Beatrice Street. Temporary vibration levels could reach approximately 72 VdB periodically as trucks pass sensitive receptors located within 25 feet from the anticipated haul routes. Therefore, the sensitive uses along anticipated construction truck routes would be exposed to ground-borne vibration up to 72 VdB, which would exceed the 65-VdB significance criteria (for recording studio use) and would be at the 72-VdB significance criteria (for residential uses) from the construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul routes would be potentially significant. There are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts associated with human annoyance from both off-site construction to a less-than-significant level. Therefore, the Project's vibration impacts with respect to human annoyance from off-site construction activities would be significant and unavoidable.

Impacts to all other impact categories analyzed in the EIR would otherwise result in less than significant or no impacts.

The EIR also presented and analyzed four alternatives to the Project. The Alternatives analysis served to identify and analyze various potential Project designs and change in uses that could achieve the Project's objectives while minimizing significant environmental impacts, allowing decision-makers to choose the option that best balances Project goals with environmental concerns by comparing different feasible alternatives.

Alternative 1: No Project Alternative

The No Project Alternative assumes that the Project would not be approved, no new permanent development would occur within the Project site, and the existing conditions would be maintained; no new construction would occur.

Alternative 2: Same FAR/Reduced Height Alternative

Alternative 2 would require all of the existing uses to be demolished and construct 283,981 square feet of office use and 3,400 square feet of ground floor retail space. The new building would be five stories, 84 feet tall and encompass the entire site. Thus, under Alternative 2, the height of the new office building would be reduced by 51 feet as compared to the Project (135 feet); the height of the new eastern building would be taller than compared to existing conditions.

Alternative 3: Reduced Development Intensity Alternative

Alternative 3 would reduce the new floor area proposed under the Project by 25 percent. Similar to the Project, Alternative 3 would retain the existing 87,881 square-foot office building on the eastern portion of the site and demolish the existing office building and accessory structures on the western portion of the site. The Alternative would result in a total of 127,655 square feet of new floor area, including 125,155 square feet of office uses and 2,500 square feet of ground floor retail space. The new building would be seven stories and approximately 114 feet in height, 21 feet shorter than the Project. This Alternative would result in approximately 103,100 square feet of net floor area compared to the Project's 169,240 square feet of net floor area and would result in a FAR of 1.10:1, less than the Project's.

Alternative 4: Mixed-Use Office and Housing Alternative

Alternative 4 would develop the site with a mix of office and residential uses. Similar to the Project, Alternative 4 would retain the 87,881 square-foot office building but demolish all other uses. The Alternative's new building would include a total of 199,500 square feet of floor area, the same as the Project, but would include 144,000 square feet of office uses and 55,500 square feet (55 units) of residential uses. The new building would be seven stories and 114 feet in height, 21 feet shorter than the Project. Alternative 4's FAR would be 1.46:1, same as the Project.

CONDITIONS OF APPROVAL AND MITIGATION MEASURES

As the Project Approvals are still valid, all Conditions of Approval identified in the Letters of Determination (LOD Conditions) issued for this Project remain in effect and will continue to apply to the Project. This includes the mitigation measures from the MND that were made Conditions of Approval in the LOD for Case No. CPC-2016-1208-CU-SPR, despite the MND being invalidated by the court.

The EIR also identifies new project design features (PDFs) and mitigation measures (MMs) that will apply to the Project. None of the EIR's new PDFs or MMs conflict with or preclude implementation of the LOD Conditions. However, some of the new PDFs and MMs are updated versions of and equivalent to the LOD Conditions.

A table is provided in Exhibit E that identifies each of the EIR's new PDFs and MMs, any equivalent LOD Conditions, and demonstrates how the new PDFs or MMs incorporate the equivalent LOD conditions or otherwise do not conflict with the LOD conditions. Note that any LOD Conditions that do not have a corresponding equivalent new PDF or MM are not included in the table but are included in the Project's LODs (Exhibits B and C), will remain unchanged and will continue to apply to the Project.

The LOD Conditions and new PDFs and MMs in the EIR will be enforceable without making any changes to the Project Approvals. Both the EIR's PDFs and MMs are included as part of the MMP

that is part of the EIR, as well as the existing LOD Conditions, will be enforced through the standard plan check and field inspection process.

PUBLIC HEARING AND COMMUNICATIONS

In accordance with CEQA Guidelines Section 15202, no public hearing is required at any stage of the environmental review process. Prior to adoption of the Project's MND and approval of the Conditional Use Permit and Site Plan Review by the CPC, a public hearing was held on behalf of the CPC on June 6, 2017. As there has been no substantial change to the Project, a public hearing was not held during or after preparation of the Project's EIR.

During the Draft EIR comment period five comment letters were received that generally focused on air quality, greenhouse gases, hazardous materials, noise, transportation, wastewater, and the alternatives that were analyzed as part of the Draft EIR. Following the Draft EIR public comment period, the Final EIR was prepared and included responses to the comments received on the content of the Draft EIR. None of the comments received would require additional mitigation measures and/or the recirculation of the Project's Draft EIR.

Since publication of the Final EIR, staff has received two inquiries regarding the public comment format at the upcoming CPC meeting and no comments in support or opposition of the Project. A Courtesy Notice was sent out to interested parties prior to the CPC meeting date.

CONCLUSION

In accordance with Los Angeles Superior Court's ruling, an EIR has been prepared for the New Beatrice West Project that informs the decision-makers and the public of the Project's significant environmental effects, identifies possible ways to minimize any significant effects, and describes reasonable project alternatives. In consideration of all the facts and mandatory CEQA findings for the EIR, City Planning Staff recommends that the CPC certify the EIR, and adopt the environmental findings, Statement of Overriding Considerations, and Mitigation Monitoring Program prepared for the New Beatrice West Project. No change would occur to the Project Approvals, conditions of approval, and entitlement findings.

FINDINGS

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS

FINDINGS OF FACT California Environmental Quality Act (CEQA)

I. INTRODUCTION

The Environmental Impact Report (EIR), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and environmental impacts of the New Beatrice West Project (Project), located at 12531-12575 West Beatrice Street and 5410-5454 South Jandy Place in Los Angeles, California (Project site). The Project proposes the demolition of an existing 23,072 square-foot office building and two accessory buildings, totaling 7,188 square feet; the retention of an 87,881 square-foot office building; and the construction of a new eight-story office building with up to 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. Upon completion, the Project would total 287,381 square feet of floor area on an approximately 4.5-acre site, with a Floor Area Ratio (FAR) of 1.46:1. The new office building would include three above-grade and two subterranean levels of parking and would have a maximum building height of 135 feet to the top of the parapet.

In August 2017, the City Planning Commission (CPC) adopted the Project's mitigated negative declaration (MND) (Case No. ENV-2016-1209-MND) and approved a Conditional Use Permit for a Major Development Project and Site Plan Review (Case No. CPC-2016-1208-CU-SPR). In June 2018, the Deputy Advisory Agency (DAA) approved the Project's Lot Line Adjustment (Case No. AA-2017-397-PMEX) to the boundary lines between three legal lots under the same ownership. These decisions were subsequently appealed by an aggrieved party. In February 2018, the City Council denied the appeals of the Conditional Use Permit and Site Plan Review, sustaining the actions of the CPC; and, in November 2018, the CPC denied the appeal of the Lot Line Adjustment and sustained the action of the DAA. Petitions were filed against the City's approvals and in January 2020, the Los Angeles County Superior Court vacated the City's approval of the Project's MND and required an Environmental Impact Report (EIR) be prepared for the Project, but did not invalidate the Project's underlying approvals.

In compliance with CEQA, PRC Section 2100 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines), the City, as the Lead Agency, has prepared a Project EIR (Case No. ENV-2020-3533-EIR and SCH No. 2020120119) pursuant to the judgment in *Karney Management v. City of Los Angeles*, Case No. BS172677 (Consolidated with Case No. 18STCP03226). The findings discussed in this document are made relative to the conclusions of the EIR.

For purposes of the EIR, the Project was analyzed in the context existing prior to the adoption of any Project approvals or entitlements by the City. Thus, all impacts of the Project's discretionary approvals were considered.

The City of Los Angeles (City), as Lead Agency, has evaluated the environmental impacts of implementation of the Project by preparing an EIR (Case Number ENV-2020-3533-EIR/State

Clearinghouse No. 2020120119). The EIR was prepared in compliance with the California Environmental Quality Act of 1970 (CEQA), Public Resources Code (PRC) Section 21000 et seq. and the California Code of Regulations Title 15, Chapter 6 (CEQA Guidelines). The findings discussed in this document are made relative to the conclusions of the EIR.

PRC Section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.” CEQA Section 21002 goes on to state that “in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

The mandate and principles included in CEQA Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See CEQA Section 21081[a]; CEQA Guidelines Section 150919[a].) For each significant environmental impact identified in an EIR for a proposed project, the approving agency must issue a written finding, based on substantial evidence in light of the whole record, reaching one or more of the three possible findings, as follows:

- 1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant impacts as identified in the EIR.
- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been, or can or should be, adopted by that other agency.
- 3) Specific economic, legal, social, technological, other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final Environmental Impact Report for the project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely “potentially significant,” these findings nevertheless fully account for all such effects identified in the Final EIR for the purpose of better understanding the full environmental scope of the Project. For each environmental issue analyzed in the EIR, the following information is provided:

The findings provided below include the following:

- Description of Significant Effects—A description of the environmental effects identified in the EIR.
- Project Design Features—A list of the project design features or actions that are included as part of the Project.

- **Mitigation Measures**—A list of the mitigation measures that are required as part of the Project to reduce identified significant impacts.
- **Finding**—One or more of the three possible findings set forth above for each of the significant impacts.
- **Rationale for Finding**—A summary of the rationale for the finding(s).
- **Reference**—A reference of the specific section of the EIR which includes the evidence and discussion of the identified impact.

With respect to a project for which significant impacts are not avoided or substantially lessened either through the adoption of feasible mitigation measures or feasible environmentally superior alternatives, a public agency, after adopting proper findings based on substantial evidence, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's benefits rendered acceptable its unavoidable adverse environmental effects. (CEQA Guidelines Sections 15093, 15043[b]; see also CEQA Section 21081[b].)

II. Environmental Review Process.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents:

Initial Study. The Project was reviewed by the City of Los Angeles Department of City Planning (Lead Agency) in accordance with the requirements of CEQA Section (PRC 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the CEQA Guidelines.

Notice of Preparation. Pursuant to the provisions of Section 15082 of the CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 31-day period commencing on December 8, 2020, and ending on January 8, 2021. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR. Written comment letters responding to the NOP were submitted to the City by various public agencies, interested organizations and individuals. The NOP, Initial Study, and NOP comment letters are included in Appendix A of the Draft EIR.

Draft EIR. The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of alternatives to the Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2020120119), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (City of Los Angeles California Environmental Quality Act Guidelines). Consistent with the requirements of Sections 15087 and 15105 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research and was circulated for public review commencing on January 4, 2024 and ending on February 20, 2024, for a total review period of 47 days. A Notice of Availability (NOA) was distributed on January 4, 2024 to all property owners

and occupants within 500 feet of the Project Site and interested parties, which informed them of where they could view the document and how to comment. The Draft EIR was available to the public at the City of Los Angeles, Department of City Planning, and the following local libraries: Los Angeles Central Library, Playa Vista Branch Library, and Mar Vista Branch Library. A copy of the document was also posted online at <https://planning.lacity.org>. Notices were filed with the County Clerk on January 4, 2024.

Notice of Completion. A Notice of Completion was sent with the Draft EIR to the Governor's Office of Planning and Research State Clearinghouse for distribution to State Agencies on January 4, 2024, and notice was provided in newspapers of general and/or regional circulation.

Final EIR. The City released a Final EIR for the Project in February 2025 which is hereby incorporated by reference in full. The Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Final EIR also incorporates the Draft EIR by reference. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR. On February 24, 2025, responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). Notices regarding availability of the Final EIR were also sent to anyone who commented on the Draft EIR, and interested parties.

Erratum. The City prepared an Erratum for the Project in February 2025. The Erratum includes a minor correction to the New Beatrice West Project EIR's Cultural Mitigation Measure (CUL-MM-1) regarding archaeological resources. The original mitigation measure included incorrect references to paleontological resources/materials and the potential submittal of a paleontological survey report to the Los Angeles County Natural History Museum. These modifications clarify and refine the EIR and provide supplemental information to the City decision-makers and the public. CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code (PRC) Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. CEQA Guidelines Section 15088.5 also provides that "[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

III. Record of Proceedings.

For purposes of CEQA and these Findings, the Record of Proceedings for the Project includes (but is not limited to) the following documents and other materials that constitute the administrative record upon which the City approved the Project. The following information is incorporated by reference and made part of the record supporting these Findings of Fact:

- All Project plans and application materials including supportive technical reports;
- The Draft EIR and Appendices, and Final EIR and Appendices, and all documents relied upon or incorporated therein by reference;
- The Mitigation Monitoring Program (MMP) prepared for the Project;

- The City of Los Angeles General Plan and related EIR;
- The Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and related EIR (SCH No. 2019011061));
- The Municipal Code of the City of Los Angeles, including but not limited to the Zoning Ordinance and Subdivision Ordinance;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits, letters, minutes of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in these Findings of Fact, in addition to those cited above; and
- Any and all other materials required for the record of proceedings by PRC Section 21167.6(e).

Pursuant to PRC Section 21081.6(a)(2) and CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Department of City Planning, as the custodian of such documents and other materials that constitute the record of proceedings, located at the City of Los Angeles, Figueroa Plaza, 221 North Figueroa Street, Suite 1350, Los Angeles, CA 90012.

In addition, copies of the Draft EIR and Final EIR are available on the Department of City Planning's website at <https://planning.lacity.org/development-services/eir> (to locate the documents, search for either the environmental case number or project title in the Search Box). The Draft and Final EIR are also available at the following three Library Branches:

- Los Angeles Central Library—630 West 5th Street, Los Angeles, CA 90071
- Mar Vista Branch Library—12006 Venice Boulevard, Los Angeles, CA 90066
- Playa Vista Branch Library—6400 Playa Vista Drive, Los Angeles, CA 90094

IV. Project Description

The Project proposes the demolition of an existing 23,072 square-foot office building and two accessory buildings, totaling 7,188 square feet; the retention of an 87,881 square-foot office building; and the construction of a new eight-story office building with up to 196,100 square feet of office space and 3,400 square feet of ground floor commercial space. Upon completion, the Project would total 287,381 square feet of floor area on an approximately 4.5-acre site, with a Floor Area Ratio (FAR) of 1.46:1. The new office building would include three above-grade and

two subterranean levels of parking and would have a maximum building height of 135 feet to the top of the parapet.

V. No Impact or Less than Significant without Mitigation

Impacts of the Project that were determined to have no impact or be less than significant in the EIR (including having a less than significant impact as a result of implementation of project design features and compliance with existing regulations) and that require no mitigation are identified below. The City has reviewed the record and agrees with the conclusion that the following environmental issues would not be significantly affected by the Project and therefore, no additional findings are needed. The following information does not repeat the full discussions of environmental impacts contained in the EIR. The City ratifies, adopts, and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Aesthetics

Impact Summary

The Project site is located in an urbanized area and lacks access to any scenic vistas. Thus, the Project would not block or obstruct views of visual resources. The Project site is not located along a state scenic highway, and the Project would not damage scenic resources within a state scenic highway or conflict with applicable zoning or regulations regarding scenic quality. Additionally, the Project would not degrade the existing visual character or quality of the site and its surroundings. The Project would implement Project Design Features AES-PDF-1, AES-PDF-2, AES-PDF-4, and AES-PDF-8, which would preserve visual character during construction and operation. Finally, the Project would implement Project Design Features AES-PDF-3 and AES-PDF-5 through AES-PDF-7 and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Draft EIR pages IV.A-25 through IV.A-45)

Project Design Features

Project Design Feature AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project site to screen construction activity from view at the street level.

Project Design Feature AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Project Design Feature AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent properties, the public right-of-way, or from above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

- Project Design Feature AES-PDF-4:** New on-site utilities that may be required to serve the Project will be installed underground.
- Project Design Feature AES-PDF-5:** All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or the public right-of-way.
- Project Design Feature AES-PDF-6:** Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.
- Project Design Feature AES-PDF-7:** Above-grade parking will be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.
- Project Design Feature AES-PDF-8:** The applicant will plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.

Agriculture and Forestry Resources

Impact Summary

The Project site is located in an urbanized area of the City of Los Angeles and is developed with commercial buildings and surface parking. The Project site and surrounding area are not zoned or designated for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the vicinity of the Project site. The Project site and surrounding area are also not enrolled under a Williamson Act Contract. No impacts to agriculture and forestry resources would occur. (Draft EIR page VI-15)

Air Quality

Impact Summary

The Project would not conflict with or obstruct implementation of the Air Quality Management Plan (AQMP) of the South Coast Air Quality Management District (SCAQMD). Further, regional and local emissions would be below established SCAQMD daily and localized thresholds during both construction and operation for criteria pollutants and toxic air contaminants, as applicable. Impacts would be less than significant. (Draft EIR pages IV.B-48 through IV.B-70)

No objectionable odors are anticipated as a result of either construction or operation of the Project and construction and operation of the Project would comply with all applicable SCAQMD regulations. Impacts would be less than significant. (Draft EIR pages VI-15 through VI-16)

Project Design Features

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators would be used during construction.

Biological Resources

Impact Summary

The Project site is located in an urbanized area and is currently developed with office uses and surface parking. Landscaping within the Project site is limited to minimal ornamental landscaping and hardscape features. None of the trees within the Project site are protected under the City of Los Angeles Protected Tree and Shrub Regulations. Based on the lack of habitat at the Project site, it is unlikely any special status species would be present on-site. In addition, no approved habitat conservation plans apply to the Project site; the Project site does not support any habitat or natural community; there are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project site or in the surrounding area; and there are no water bodies on the Project site or in the vicinity that could serve as habitat for fish. Although Centinela Creek Channel is located approximately 300 feet north of the Project site, construction of the Project would not result in its removal, filling, or other means of hydrological interruption. Also, there are no established native resident or migratory wildlife corridors on the Project site or in the vicinity. Tree removal would comply with the City's Protected Tree and Shrub Regulations, the Migratory Bird Treaty Act and the California Fish and Game Code. Impacts would be less than significant. (Draft EIR pages VI-16 through VI-17)

Cultural Resources (Historical Resources and Human Remains)

Impact Summary

Based on a review of the SurveyLA Historic Resources Survey Report for the Palms–Mar Vista–Del Rey community, the HistoricPlacesLA database, and the Los Angeles ZIMAS database, as well as the South Central Coastal Information Center (SCCIC) records search, no historical resources were identified on-site or on adjacent sites. Further, as the Project site is located within an urbanized area and has been subject to previous grading and development, the potential for uncovering human remains on the Project site is low. If human remains are discovered during Project construction, Project construction would be required to comply with applicable regulatory requirements including California Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). Thus, impacts related to these thresholds would be less than significant. (Draft EIR page VI-17 through VI-18)

Energy

Impact Summary

The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, and unnecessary consumption of energy resources during construction or operation.

The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Overall, the Project's energy demands would not cause wasteful, inefficient, or unnecessary use of energy. The Project would implement Project Design Features GHG-PDF-1, which requires the Project to achieve LEED Silver certification. In addition, the Project would comply with all applicable energy conservation policies and plans, including CAFÉ fuel economy standards, CARB anti-idling regulations and In-Use Off-Road Diesel Fleet regulations, the California Title 24 energy standards, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal, and SCAG's 2020–2045 RTP/SCS. As such, the Project would not conflict with or obstruct adopted energy conservation plans or violate state or local energy standards for renewable energy or energy efficiency. Impacts would be less than significant. (Draft EIR pages IV.D-24 through IV.D-44)

Geology and Soils (not including Paleontological Resources)

Impact Summary

No active faults cross the Project site and the Project site is not located within an Alquist-Priolo Fault Zone. Therefore, the potential for surface rupture due to faulting beneath the Project Site is considered low and impacts would be less than significant. (Draft EIR page VI-18)

While the Project site is located in the seismically active region of Southern California and could be subject to strong seismic ground shaking, the Project's design and construction would comply with all applicable regulatory requirements, including applicable provisions of the Los Angeles Building Code relating to seismic safety. Through compliance with regulatory requirements and site-specific geotechnical recommendations contained in the Geotechnical Engineering Investigation, impacts would be less than significant. (Draft EIR page VI-18)

While the Project Site is located within a liquefaction area and could be susceptible to liquefaction during an earthquake, the Project design and construction would comply with all applicable requirements of the Los Angeles Department of Building and Safety for a site located within a potentially liquefiable area, as well as site-specific design recommendations set forth in the Geotechnical Engineering Investigation. Impacts would be less than significant. (Draft EIR pages VI-18 through VI-19)

The Project site and surrounding area are fully developed and characterized by relatively flat topography, and are not located in a landslide area mapped by the State or the City. No impact would occur. (Draft EIR page VI-19)

All grading activities would require grading permits from LADBS and on-site grading and site preparation would comply with all applicable regulatory requirements, including provisions of the LAMC, as well as Best Management Practices. Furthermore, the Project would be required to comply with the City's Low Impact Development (LID) ordinance and implement standard erosion controls. Impacts related to soil erosion would be less than significant. (Draft EIR page VI-19)

With respect to unstable soils, as discussed above, impacts would be less than significant with compliance with applicable regulatory requirements and site-specific design recommendations set forth in a final design-level geotechnical report. (Draft EIR page VI-19)

The on-site geologic materials are in the low to high expansion range. With adherence to existing regulations and site-specific design recommendations provided in the Geotechnical Engineering Investigation, the proposed structure is feasible from a geotechnical engineering standpoint. Impacts would be less than significant. (Draft EIR page VI-19)

The Project site is served by existing sewage infrastructure and would not require the use of septic tanks or alternative wastewater disposal systems. No impacts related to septic tanks or alternative wastewater disposal systems would occur. (Draft EIR page VI-19)

Finally, the Project site has been previously disturbed/developed and does not contain unique geologic features. Therefore, impacts would be less than significant. (Draft EIR page IV.E-11)

Greenhouse Gas Emissions

Impact Summary

The Project complies with or exceeds the performance-based standards included in the plans, policies, regulations and GHG reduction actions/strategies outlined in CARB's 2008 Climate Change Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and L.A.'s Green New Deal. As such, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs and impacts would be less than significant. Furthermore, because the Project does not conflict with applicable plans, policies, and regulations, the Project's incremental increase in GHG emissions would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant. (Draft EIR pages IV.E-56 through IV.E-83)

Project Design Features

Project Design Feature GHG-PDF-1: The design of the new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including, but not limited to, Energy Star appliances, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation system, and water-efficient landscaping.

Hazards and Hazardous Materials

Impact Summary

Construction of the Project would not involve the routine transport of hazardous materials to and from the Project site, although some hazardous materials would be used and disposed of occasionally, which would cease upon completion of the Project. Operation of the Project would involve the routine use of small quantities of potentially hazardous materials typical of those used in office and commercial uses. All hazardous materials would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, State, and local requirements. Impacts would be less than significant. (Draft EIR pages IV.F-28 through IV.F-29)

The Project's construction and operation would not result in a reasonably release of any hazardous materials. Dewatering operations are expected during construction, and any discharge of groundwater would occur pursuant to, and comply with, the applicable NPDES permit requirements. Further, there are no aboveground storage tanks, and, in the unlikely event that an underground storage tank is found, all materials would be removed in accordance with all applicable federal, State, and local regulations. Additionally, with compliance with existing regulations, implementation of the Project during construction or operation would not release any hazardous materials including Asbestos-Containing Materials, Lead-Based Paint, Polychlorinated Biphenyls (PCBs), Oil Wells, or Methane Gas. Impacts would be less than significant (Draft EIR pages IV.F-29 through IV.F-35)

The Project site is not located within 0.25 mile of an existing or proposed school. Impacts would be less than significant. (Draft EIR pages IV.F-35 through IV.F-36)

The Project Site is listed in the HAZNET database due to the removal of unnamed hazardous material to a landfill in 2012. Due to the proper handling, storage, and disposal of the prior waste, and no reported regulatory violations, the former waste is not considered to be an environmental concern to the Project site. Impacts would be less than significant. (Draft EIR pages IV.F-36 through IV.F-37)

The Project Site is not located within two miles of an airport, private airstrip, or within an area subject to an airport land use plan. Accordingly, no impact would occur. (Draft EIR pages VI-19 through VI-20)

While it is expected that the majority of construction activities for the Project would be confined to the Project site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. If lane closures are necessary during construction, the remaining travel lanes would be maintained in accordance with the Project's Construction Traffic Management Plan that would be implemented pursuant to Project Design Feature TR-PDF-1 to ensure adequate circulation and emergency access. Additionally, the Project would comply with LAFD access requirements and would not impede emergency access within the vicinity. Impacts would be less than significant. (Draft EIR page VI-20)

The Project site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a City-designated Wildfire Severity Zone. Accordingly, no impact would occur. (Draft EIR page VI-20)

Hydrology and Water Quality

Impact Summary

In accordance with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements, the Project would implement a Stormwater Pollution Prevention Plan (SWPPP) adhering to the California Stormwater Quality Association BMP Handbook. The SWPPP would set forth Best Management Practices (BMPs) to be used during construction for stormwater and non-stormwater discharges to minimize the discharge of pollutants in stormwater runoff during construction. In addition, Project construction would occur in accordance with City grading regulations. During operation, consistent with the City's Low Impact Development (LID) Ordinance, the Project would include the installation of capture and use or biofiltration planter BMPs to reduce the quantity and improve the quality of rainfall runoff that leaves the Project site. In addition, with implementation of the Project, the amount of landscaped area would increase, resulting in an overall decrease in the amount of impervious surfaces and thus further reduce stormwater runoff. Further, if groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all relevant NPDES and Los Angeles Regional Water Quality Control Board requirements related to construction and discharges from dewatering operations. The Project site is not located within a 100-year flood plain, nor is it mapped as being located within a flood control basin or within a potential inundation area. Overall, with adherence to regulatory requirements, impacts related to hydrology and water quality would be less than significant. (Draft EIR pages VI-21 through VI-24)

Land Use and Planning

Impact Summary

The Project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The Project would replace the existing structures at 12575 W. Beatrice Street with a new office building. The existing office building at 12541 W. Beatrice Street would remain. Thus, the proposed uses would be consistent with the existing uses on site as well as the other commercial developments located adjacent to and in the general vicinity of the Project Site. All proposed development would occur within the boundaries of the Project Site, and the Project does not propose a freeway or other large infrastructure that would divide a community. Accordingly, impacts related to the physical division of an established community would be less than significant. (Draft EIR page VI-24)

The Project would not conflict with the applicable goals, policies, and objectives in local and regional plans that were adopted for the purpose of avoiding or mitigating an environmental effect, including the Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the South Coast Air Quality Management District Air Quality Management Plan, General Plan Framework Element, Conservation Element, Mobility Plan 2035, Palms–Mar Vista–Del Rey Community Plan, LAMC, and the Citywide Design

Guidelines include policies that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. The Project would not and therefore would not conflict with the applicable plans. As such, impacts related to conflicts with applicable plans, policies, and regulations would be less than significant. (Draft EIR pages IV.H-18 through IV.H-32)

Mineral Resources

Impact Summary

No mineral extraction operations currently occur on the Project site. Furthermore, the Project site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present or within a mineral producing area as classified by the California Geologic Survey. No impact would occur. (Draft EIR page VI-24)

Noise (Operational Noise, On- and Off-site Construction Vibration Building Damage, Operational Vibration, and Airport Noise)

Impact Summary

Operational noise levels related to on-site stationary noise sources and off-site mobile noise sources would be below the thresholds established in the LAMC. Impacts would be less than significant. (Draft EIR pages IV.I-38 through IV.I-48)

On-site and off-site vibration levels generated from construction of the Project would be below the building damage criterion. Thus, construction-related vibration impacts pursuant to the FTA significance criterion for building damage from on-site and off-site construction activities would be less than significant. (Draft EIR pages IV.I-51 and IV.1-53 through IV.1-55)

Operation of the Project would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site and impacts would be less than significant. (Draft EIR page IV.I-55)

The Project Site is not located within the vicinity of a private airstrip or airport land use plan. In addition, based on a report published by the Los Angeles International Airport, the Project site is not located within the 2015 65 dB CNEL noise contours for the airport, indicating airport noise is not an issue at the Project site. No impact would occur. (Draft EIR page VI-24)

Project Design Features

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the acoustic line-of-sight from the equipment to the off-site noise-sensitive receptors.

Population and Housing

Impact Summary

Since the Project does not propose a housing component, it would not directly induce a new residential population which would contribute to population growth in the vicinity of the Project site or the Palms–Mar Vista–Del Rey Community Plan area. In addition, the Project's net increase in employment would represent a small fraction of employment growth projected by SCAG's RTP/SCS. Impacts would be less than significant. (Draft EIR page VI-25)

The Project Site is currently developed with office uses and surface parking. As no housing currently exists on the Project Site, the Project would not displace any existing persons or housing, and no impact related to the displacement of people or housing would occur. (Draft EIR Page VI-25)

Public Services

Impact Summary

Project construction and operation would increase the demand for LAFD fire protection services. However, the Project would not include any unique or especially hazardous uses and would comply with all applicable requirements. Compliance with applicable regulatory requirements, including OSHA and LAMC regulations, in addition to Project Design Feature TR-PDF-1, which requires a Construction Traffic Management Plan, would ensure that adequate safe access and fire prevention features that reduce the demand on LAFD facilities and equipment are provided. As such, impacts would be less than significant. (Draft EIR pages IV.J.1-21 through IV.J.1-27)

The Project would introduce a new employee and visitor population to the Project Site. Overall, LAPD concluded that a project of this size could have a minor impact on police protection services. Project Design Features POL-PDF-1 and TR-PDF-1 would implement safety measures and ensure safe access, respectively, during construction. Further, Project Design Features POL-PDF-2 through POL-PDF-6 provide numerous design and operational features to enhance safety within and immediately surrounding the Project site. As such, impacts would be less than significant. (Draft EIR pages IV.J.2-12 through IV.J.2-16)

With respect to schools, the Project does not include residential uses and would not result in a direct increase in the number of students in Los Angeles Unified School District (LAUSD) schools. Furthermore, per Senate Bill 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Impacts would be less than significant. (Draft EIR page VI-26)

With respect to parks and recreation and libraries, the Project would not include residential uses and would not generate a new residential population that would regularly utilize nearby parks, recreational facilities, and/or libraries. The new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project site who already utilize existing parks/recreational facilities and libraries. Therefore, only

a fraction of the new employees generated by the Project could create a demand for these facilities. While it is possible that some of the employees may utilize local parks/recreational facilities and libraries, such use would be anticipated to be limited due to work obligations and the amount of time it would take for employees to access these facilities. In addition, Project employees would be more likely to use parks/recreational facilities and libraries near their homes during non-work hours. Impacts would be less than significant. (Draft EIR pages VI-26 through VI-27)

Project Design Features

- Project Design Feature POL-PDF-1:** During construction, the Applicant will implement temporary security measures, including security fencing, lighting, locked entry, and regular security patrols during non-construction hours.
- Project Design Feature POL-PDF-2:** The Project will include security measures for entry into the building and parking area, including a keycard system.
- Project Design Feature POL-PDF-3:** The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.
- Project Design Feature POL-PDF-4:** The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.
- Project Design Feature POL-PDF-5:** The Project will design entrances to and exits from the building, open spaces around the building, and pedestrian walkways to be open and in view of surrounding sites.
- Project Design Feature POL-PDF-6:** The Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention features into the building design and operation. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Transportation

Impact Summary

The Project would not conflict with the applicable programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, including the Mobility Plan 2035, Palms-Mar Vista-Del Rey Community Plan, Vision Zero, the LAMC, and SCAG's 2020-2045 RTP/SCS, and impacts would be less than significant. (Draft EIR pages IV.K-25 through IV.K-30)

The Project Site is located in an urbanized area developed with numerous roadways and infrastructure. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project site driveways provide clear

lines of sight. In addition, the Project would not physically modify the curb placement or turning radius at the Jandy Place and Beatrice Street intersection and would not physically alter the sidewalks along Jandy Place and Beatrice Street adjacent to the Project site. The Project would not include any new public roads or incompatible uses that would result in an increase in hazards due to a design feature. Project Design Feature TR-PDF-2 establishes vehicle access from Jandy Place during lunch hours to minimize any potential safety risks to pedestrians. In addition, with incorporation of the previously approved improvements, which will be incorporated into the Project, the Project weekday a.m. and p.m. peak hour traffic volumes would not cause or substantially extend vehicle queuing at the study intersections analyzed and, therefore, would not cause any constraint on the Project access. Impacts would be less than significant. (Draft EIR pages IV.K-34 through IV.K-38)

Emergency access would be maintained throughout construction and operation. Project Design Feature TR-PDF-1 requires a Construction Traffic Management Plan, which would ensure that adequate safe access during construction. In addition, the Project would comply with LAFD access requirements, including required fire lane widths, turning radii, secondary access, etc., and plot plans would be submitted to LAFD for approval. Impacts would be less than significant. (Draft EIR pages IV.K-38 through IV.K-39)

Project Design Features

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, the Worksite Traffic Control Plan, approved by the City of Los Angeles, will route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project site during construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.

Project Design Feature TR-PDF-2: In order to enhance safety for pedestrians on Jandy Place, during the 60-minute lunch time period between 12:30 P.M. and 1:30 P.M., Monday through Friday, the ingress and egress to the Project site from Jandy Place will be closed, and the only available ingress and egress will be via Beatrice Street.

Within the Project's first year of 80-percent occupancy, the Project will submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the A.M. peak and P.M. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined above. The analysis will be submitted to LADOT for review. If deemed warranted by LADOT, the Project will implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.

Tribal Cultural Resources

Impact Summary

The Project would require excavation for subterranean parking and building foundations and therefore has the potential to uncover previously unidentified tribal cultural resources. However, the Tribal Cultural Resources Report has concluded that no tribal cultural resources have been identified within the Project site. Further, as a result of AB 52 consultation, the Soboba Band of Luiseno Indians requested that a Native American monitor be present during excavation activities. The City also generally applies a standard condition of approval to projects that provides the procedure to be followed in the event of the inadvertent discovery of tribal cultural resources. With implementation of the requirement for a Native American monitor and the City's standard condition of approval, impacts would be less than significant. (Draft EIR pages IV.L-18 through IV.L-19)

Utilities and Service Systems

Impact Summary

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. The Project would incorporate a fire sprinkler suppression system in the proposed building to reduce or eliminate the public hydrant demands. In addition, as part of the Project, water service upgrades necessary to achieve the adequate fire flow would be implemented. With the implementation of the water infrastructure upgrades, the public water infrastructure would provide adequate water pressure to serve the Project site's anticipated water demand. Impacts would be less than significant. (Draft EIR pages IV.M.1-17 through IV.M.1-21)

LADWP's 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry, and multiple-dry years through the year 2040. As such, sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant. (Draft EIR page IV.M.1-21)

The Project's increase in average daily wastewater flow would represent a small percentage of the current estimated remaining available capacity at the Hyperion Water Reclamation Plant (HWRP). Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP and would not exceed wastewater requirements of LARWQCB, thus new

or expanded treatment facilities would not be required. In addition, the existing capacity of the sewer lines near the Project site would have sufficient capacity to serve the Project. Impacts would be less than significant. (Draft EIR pages VI-27 through VI-28)

The Project site is located in an area served by existing telecommunications infrastructure. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the existing system. No upgrades to off-site telecommunications systems are anticipated. Impacts would be less than significant. (Draft EIR page VI-29)

The Project's estimated net increase in solid waste disposal represents only a small fraction of the remaining capacity at the Class III landfills serving the County. The Project would also comply with all applicable state and local regulations related to solid waste. Impacts would be less than significant. (Draft EIR pages VI-30 through VI-31)

Construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant. (Draft EIR pages IV.N.4-7 through IV.N.4-10)

Project Design Features

Project Design Feature WAT-PDF-1: The Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow are as follows:

- 12,000 gpm fire flow: Approximately 865 linear feet of 16-inch diameter ductile iron pipe, 600 linear feet of 12-inch ductile iron pipe and 4 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Jandy Place to Grosvenor Boulevard. The new 12-inch pipe will be constructed in Jandy Place from the cul-de-sac end to Beatrice Street, and extend westerly on Beatrice Street approximately 200 linear feet, replacing the existing 8-inch water main in those streets.
- 9,000 gpm fire flow: Approximately 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe and 2 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Westlawn Avenue to Grosvenor Boulevard, replacing the existing 8-inch water main. The new 12-inch pipe will be constructed in Beatrice Street from Jandy Place to Westlawn Avenue, replacing the existing 8-inch water main.

Wildfire

Impact Summary

The Project site is not located within a City-designated Very High Fire Hazard Severity Zone, nor is it located within a Wildfire Severity Zone. Therefore, no impact related to wildfire risks would occur. (Draft EIR page VI-31)

VI. Less than Significant Impacts with Mitigation

The EIR determined that the Project has potentially significant environmental impacts in the areas discussed below. The EIR identified feasible mitigation measures to avoid or substantially reduce the environmental impacts in these areas to a level of less than significant. Based on the information and analysis set forth in the EIR, the Project would not have any significant environmental impacts in these areas, as long as all identified feasible mitigation measures are incorporated into the Project. The City again ratifies, adopts, and incorporates the full analysis, explanation, findings, responses to comments, and conclusions of the EIR.

Cultural Resources (Archaeological Resources)

Impact Summary

The Project site is located within an urbanized area of the City of Los Angeles and has been subject to grading and development in the past. Therefore, surficial archaeological resources that may have existed at one time have likely been previously disturbed. In addition, based on the records search at the SCCIC, no archaeological resources have been found at the Project site. Nevertheless, the Project would require grading and excavation for the construction of the proposed subterranean parking garage, which would extend to a depth of approximately 22 feet below ground surface. Because the Project site is fully developed and has undergone previous development, any new archaeological survey is unlikely to observe surface artifacts. However, since the Project would include excavation to previously undisturbed depths, there is potential for an archaeological site to be identified during construction activities associated with the Project. Additionally, as indicated in the SCCIC records search, the Project site vicinity is potentially sensitive for archaeological resources. Therefore, impacts to archaeological resources would be potentially significant. However, with the implementation of Mitigation Measure CUL-MM-1, impacts would be reduced to less than significant.

Project Design Features

None applicable to archeological resources.

Mitigation Measures

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If

archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the South Central Coastal Information Center and the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

Finding

Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

Rationale for Finding

Mitigation Measure CUL-MM-1 would require that a qualified archaeologist be retained to perform periodic inspections of excavation and grading activities at the Project site to ensure that in the event archaeological resources are discovered, such resources would be handled and treated in accordance with the archaeologist's recommendations. As such, with the implementation of Mitigation Measure CUL-MM-1, impacts related to archeological resources would be reduced to a less than significant level.

Reference

Section IV.C, Cultural Resources (Archaeological Resources), pages IV.C-21 through IV.C-22, of the Draft EIR and Appendix D, SCCIC Records Search, of the Draft EIR.

Geology and Soils (Paleontological Resources)

Impact Summary

There are no previously encountered fossil vertebrate localities located within the Project site. However, the Project would include excavations to a maximum depth of 22 feet below ground surface. Thus, the possibility exists that paleontological artifacts that were not discovered during prior construction and other human activity on the Project site may be encountered during Project excavation activities. As such, impacts to paleontological resources would be potentially significant. However, implementation of Mitigation Measure GEO-MM-1 would reduce impacts to a less than significant level.

Project Design Features

None applicable to paleontological resources.

Mitigation Measures

Mitigation Measure GEO-MM-1: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Finding

Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

Rationale for Finding

Mitigation Measure GEO-MM-1 would require that a qualified paleontologist be retained to perform periodic inspections of excavation and grading activities at the Project site to ensure that in the event paleontological resources are discovered, such resources would be handled and treated in accordance with the paleontologist's recommendations. With the implementation of Mitigation Measure GEO-MM-1, impacts related to paleontological resources would be reduced to a less than significant level.

Reference

Section IV.D, Geology and Soils (Paleontological Resources), pages IV.E-11 through IV.E-12, of the Draft EIR and Appendix F, Natural History Museum of Los Angeles County Paleontological Records Search, of the Draft EIR.

Transportation (Vehicle Miles Traveled)

Impact Summary

Project-level impacts with respect to conflict with CEQA Guidelines Section 15064.3(b) were determined to be potentially significant without mitigation with a daily work VMT per employee of 12.4, which would exceed the daily work VMT per employee of 11.1 for the West Los Angeles Area Planning Commission (APC) area. With the implementation of Mitigation Measure TR-MM-

1, the daily work VMT per employee would be reduced to 10.3. Therefore, impacts would be less than significant after implementation of feasible mitigation.

Project Design Features

None applicable to VMT impacts.

Mitigation Measures

Mitigation Measure TR-MM-1: The Project shall prepare a TDM Plan. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

The following TDM elements shall be included in the Project:

- Price Workplace Parking—implement workplace parking pricing for employees as specified in the Transportation Assessment.
- Voluntary Travel Behavior Change Program—assign a staff person who will serve as the transportation management coordinator for purposes of developing a transportation program and informing Project employees of available travel options.
- Bike parking per LAMC, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel.
- Include secure bike parking, with its own access point, and bike facilities, such as showers and a repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities.
- Pedestrian Network Improvements—provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street.
- Transit Subsidies—provide a daily transit subsidy as specified in the Transportation Assessment for every employee who requests the transit subsidy, presents evidence of use of transit, and does not request on-site parking.

Finding

Pursuant to PRC Section 21081(a)(1), the City finds that changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

Rationale for Finding

With the implementation of Mitigation Measure TR-MM-1, the Project's daily work VMT would be reduced to 10.3, below the West Los Angeles Area Planning Commission (APC) area daily work VMT per employee of 11.1, and impacts would be reduced to a less than significant level.

Reference

Section IV.K, Transportation, pages IV.K-30 through IV.K-33, of the Draft EIR and the Transportation Assessment included as Appendix K of the Draft EIR.

VII. Significant and Unavoidable Impacts

The Final EIR determined that the environmental impacts set forth below are significant and unavoidable. In order to approve the Project with significant unmitigated impacts, the City is required to adopt a Statement of Overriding Considerations, which is set forth in Section XII below. No additional environmental impacts other than those identified below will have a significant effect or result in a substantial or potentially substantial adverse effect on the environment as a result of the construction or operation of the Project. The City finds and determines that:

- a) All significant environmental impacts that can be feasibly avoided have been eliminated, or substantially lessened through implementation of the project design features and/or mitigation measures; and
- b) Based on the Final EIR, the Statement of Overriding Considerations set forth below, and other documents and information in the record with respect to the construction and operation of the project, all remaining unavoidable significant impacts, as set forth in these findings, are overridden by the benefits of the project as described in the Statement of Overriding Considerations for the construction and operation of the project and implementing actions.

Noise (Construction/On-Site Noise)

Impact Summary

The significance criterion used is whether Project-related construction noise exceeds the ambient exterior noise levels by 5 dBA (hourly Leq) or more at a noise-sensitive use. The Project will implement Project Design Feature PDF-NOI-1, which will require noise reducing best management practices for construction equipment. As evaluated in Section IV.I, Noise, of the Draft EIR, the estimated noise levels during all stages of Project construction would be below the significance threshold at receptor locations R2 and R4. However, the estimated construction-related noise would exceed the significance criterion at receptor locations R1, R3, and R5. (As provided in Section IV.I, Noise, of the Draft EIR, studios, sound stages, and recording studio uses are not defined as noise sensitive receptors by the L.A. CEQA Thresholds Guide. As such, the studios located in the vicinity of the Project site, including 740 Sound (represented by receptor location R4) and the Vista Studio, Venn Studios, Digital Domain and ATN Stages (together represented by receptor location R5) were included in the noise analysis for informational purposes only and not for determining a CEQA impact). The estimated construction-related noise would exceed the significance threshold by a range of 2.6 dBA at receptor location R3 to up to 26.9 dBA at receptor location R5. Therefore, the Project's temporary noise impact associated with the Project's on-site construction would be potentially significant.

Project Design Features

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Where feasible, electric construction equipment and/or other noise-reducing best practices will be utilized/implemented near sensitive receptors.

Mitigation Measures

Mitigation Measure NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project site between the construction areas and receptor locations R1 and R3. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor locations R1 and 5-dBA at receptor location R3.
- Along the western property line of the Project site between the construction areas and the receptor location R5. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R5.
- During the off-site improvements construction—Provide a temporary moveable noise barrier between the construction equipment and the residences along the south side of Beatrice Street (receptor locations R1 and R3) and along the east side of Grosvenor Boulevard (receptor location R2), where feasible. The temporary noise barrier shall be designed to provide a minimum 10-dBA at the ground level of receptor location R1, 8-dBA at receptor location R2, and 5-dBA at receptor location R3.

Finding

Pursuant to PRC Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including consideration for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barriers) would reduce the noise generated by on-site

construction activities at the off-site noise-sensitive uses, by up to 15 dBA at receptor locations R1 and R5 and 5-dBA at R3. As summarized in Table IV.I-11 on page IV.I-35, the estimated construction-related noise would exceed the significance threshold by 22.9 dBA at receptor location R1, 2.6 dBA at receptor location R3, and 26.9 dBA at receptor location R5. Implementation of Mitigation Measure NOI-MM-1, which offers a 5-dBA noise reduction at receptor location R3 would, therefore, reduce the noise impacts at receptor location R3 to a less-than-significant level. However, the estimated construction-related noise levels would still exceed the significance thresholds at receptor locations R1 (apartments), by 7.9 dBA, and R5 (studios), by 11.9 dBA, with the implementation of Mitigation Measure NOI-MM-1. There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from on-site construction at receptor locations R1 and R5. **Therefore, the Project's construction noise impact associated with on-site noise sources would be significant and unavoidable.**

Reference

See Draft EIR Section IV.I, Noise and Appendix I of the Draft EIR for a complete evaluation of noise impacts, thresholds, and evaluation methods conducted for the Project.

Noise (Construction/Off-Site Noise)

Impact Summary

Off-site construction-related noise sources may include materials delivery, concrete mixing, and haul trucks, as well as construction worker vehicles accessing the Project Site during construction. The most significant noise sources associated with off-site construction-related noise would be from material delivery/concrete/haul trucks. The significance threshold for off-site construction noise impacts is whether Project-related construction noise exceeds the ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive location. The hourly noise levels generated by Project construction trucks would exceed the significance criterion of a 5-dBA increase over the ambient noise level along Beatrice Street (by 5.4 L_{eq} [dBA]), Westlawn Avenue (by 4.8 L_{eq} [dBA]) and Grosvenor Boulevard (by 4.2 L_{eq} [dBA]), during the grading/excavation, foundation, and building construction phases. The estimated construction trucks noise levels along Jefferson Boulevard would be below the existing ambient noise level. Therefore, the Project's temporary noise impacts associated with off-site construction traffic would be potentially significant.

Additionally, improvements required for specified fire flows presented in Project Design Feature WAT-PDF-1 will require off-site construction activities that would involve a limited number of construction equipment, which would comply with Project Design Feature NOI-PDF-1 (noise reducing best management practices). Noise levels associated with the potential water infrastructure improvements would range from 62.7 dBA (L_{eq}) at the residential receptor location R3 (located along Westlawn Avenue) to 79.6 dBA (L_{eq}) at the residential receptor location R1 (located along Beatrice Avenue) should the City determine that infrastructure improvements are needed near these locations based on the requisite fire flow. The estimated noise levels at the residential uses on the east side of Grosvenor Boulevard (receptor location R2) would be approximately 68.6 dBA (L_{eq}). Noise levels associated with the potential water infrastructure

improvements at these locations would be equal to or less than the estimated noise levels from the on-site construction activities that would already be occurring and were addressed in the Draft EIR and, similarly, construction-related noise levels during Project construction would continue to exceed the 5-dBA significance threshold. Therefore, the Projects temporary noise impacts associated with the off-site water improvements would be potentially significant.

Project Design Features

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Where feasible, electric construction equipment or other noise-reducing best practices will be utilized/implemented near sensitive receptors.

Mitigation Measures

Mitigation Measure NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project site between the construction areas and receptor locations R1 and R3. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor locations R1 and 5-dBA at receptor location R3.
- Along the western property line of the Project site between the construction areas and the receptor location R5. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R5.
- During the off-site improvements construction—Provide a temporary moveable noise barrier between the construction equipment and the residences along the south side of Beatrice Street (receptor locations R1 and R3) and along the east side of Grosvenor Boulevard (receptor location R2), where feasible. The temporary noise barrier shall be designed to provide a minimum 10-dBA at the ground level of receptor location R1, 8-dBA at receptor location R2, and 5-dBA at receptor location R3.

Finding

Pursuant to PRC Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including consideration for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

The short-term noise impacts associated with off-site construction traffic would be significant along nearby segments of Westlawn Avenue, Beatrice Street and Grosvenor Boulevard due primarily to construction trucks along the haul route prior to reaching Jefferson Boulevard. There are no feasible mitigation measures that could be implemented to reduce this short-term impact because conventional mitigation measures, such as providing temporary noise barrier walls, would not be feasible as the barriers would obstruct vehicular and pedestrian access, as well as visibility to the properties along these street segments and would extend for a significant distance on city streets until the haul trucks reach Jefferson Blvd. **Therefore, the Project's construction noise impact associated with off-site construction traffic would be significant and unavoidable.**

Implementation of Mitigation Measure NOI-MM-1 would reduce the noise generated by off-site construction activities at the adjacent noise-sensitive uses by a minimum 10-dBA at receptor location R1, 8-dBA at receptor location R2, and 5-dBA at receptor location R3. Noise impacts associated with the water infrastructure improvements would be reduced to a less than significant level at receptor locations R2 and R3. However, construction-related noise levels would still exceed the significance thresholds at receptor location R1 with the implementation of Mitigation Measure NOI-MM-1 as temporary moveable noise barriers are typically limited to a 10-dBA noise reduction (unlike a fixed barrier which can achieve a noise reduction of up to 15-dBA). There are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts from off-site construction at receptor location R1. **Therefore, the Project's off-site construction-related noise impacts would be significant and unavoidable.**

Reference

See Draft EIR Section IV.I, Noise and Appendix I of the Draft EIR for a complete evaluation of noise impacts, thresholds, and evaluation methods conducted for the Project.

Noise (Construction/On-Site Vibration [Human Annoyance])

Impact Summary

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential, and 65 VdB for recording studio uses. As indicated in Table IV.I-23 in Section IV.I, Noise, of the Draft EIR, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at off-site sensitive receptor locations R2 through R4. However, the estimated ground-borne vibration levels at receptor locations R1 and R5 would exceed the 72-VdB and 65-VdB significance criteria, respectively. Therefore, on-site vibration impacts during construction of the Project, pursuant to the significance criteria for human annoyance, would be potentially significant.

Project Design Features

There are no project design features applicable to the Project's human annoyance impacts from ground-borne vibration caused by on-site construction.

Mitigation Measures

There are no feasible mitigation measures applicable to the Project's human annoyance impacts from ground-borne vibration caused by on-site construction.

Finding

Pursuant to PRC Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including consideration for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

Mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall of sheet piles installed into the ground (essentially a subterranean sound barrier to reduce noise). To be effective, however, wave barriers must typically be very deep and long, rendering them cost prohibitive and infeasible for temporary applications such as construction. Constructing a wave barrier would also generate the same ground-borne vibration that is sought to be mitigated. **Thus, as explained in the Draft EIR, there are no feasible mitigation measures to reduce construction-related human annoyance impacts from on-site ground-borne vibration.**

Reference

See Draft EIR Section IV.I, Noise and Appendix I of the Draft EIR for a complete evaluation of noise impacts, thresholds, and evaluation methods conducted for the Project.

Noise (Construction/Off-Site Vibration [Human Annoyance])

Impact Summary

As discussed above, per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential, and 65 VdB for recording studio uses. It should be noted that buses and trucks rarely create vibration that exceeds 70 VdB at 50 feet from the receptor unless there are bumps in the road. To provide a conservative analysis, the estimated vibration levels generated by construction trucks traveling along the anticipated haul routes were assumed to be within 25 feet of the sensitive uses, including residential uses along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard; and recording studio uses along Beatrice Street. As indicated in the noise calculation worksheets included in Appendix I of this Draft EIR, temporary vibration levels could reach approximately 72 VdB periodically as trucks pass sensitive receptors located within 25 feet from the anticipated haul routes. Therefore, the

sensitive uses along anticipated construction truck routes would be exposed to ground-borne vibration up to 72 VdB, which would exceed the 65-VdB significance criteria (for recording studio use) and would be at the 72-VdB significance criteria (for residential uses) from the construction trucks. As such, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul routes would be potentially significant.

Project Design Features

There are no project design features applicable to the Project's off-site construction-related vibration impacts to human annoyance.

Mitigation Measures

There are no feasible mitigation measures applicable to the Project's off-site construction-related vibration impacts to human annoyance.

Finding

Pursuant to PRC Section 21081(a)(3), specific economic, legal, social, technological, or other considerations, including consideration for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

Rationale for Finding

There are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts associated with human annoyance from both off-site construction to a less-than-significant level. **Therefore, the Project's vibration impacts with respect to human annoyance from off-site construction activities would be significant and unavoidable.**

Reference

See Draft EIR Section IV.I, Noise and Appendix I of the Draft EIR for a complete evaluation of noise impacts, thresholds, and evaluation methods conducted for the Project.

VIII. Alternatives

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that could substantially reduce or avoid the significant impacts of a project while also meeting the project's basic objectives. An EIR must identify ways to substantially reduce or avoid the significant effects that a project may have on the environment (PRC Section 21002.1). Accordingly, the discussion of alternatives shall focus on alternatives to a project or its location which are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternative analysis included in the Draft EIR, therefore, identified a reasonable range of project alternatives focused on avoiding or substantially reducing the project's significant impacts.

Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines Section 15096(g)(2), that no feasible alternative or mitigation measure will substantially lessen any significant effect of the Project, reduce the significant unavoidable impacts of the Project to a level that is less than significant, or avoid any significant effect the Project would have on the environment.

Project Objectives

An important consideration in the analysis of alternatives to the Project is the degree to which such alternatives would achieve the objectives of the Project. As more thoroughly described in Section II, Project Description, of the Draft EIR, pages II-6 through II-7, both the City and Applicant have established specific objectives concerning the Project, which are incorporated by reference herein and discussed further below.

Alternatives Analyzed

Alternative 1—No Project Alternative

Description of Alternative

In accordance with the CEQA Guidelines, the “no project” alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment, as described in Section II, Project Description, of the Draft EIR, would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings and surface parking areas would remain on the Project Site, and no new construction would occur.

Impact Summary

Alternative 1 would avoid the Project’s significant and unavoidable environmental impacts, including those related to on- and off-site construction noise and vibration (pursuant to the significance criteria for human annoyance). Alternative 1 would also avoid the Project’s less-than-significant impacts as no changes to the existing conditions would occur.

Finding

The City finds, pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the No Project Alternative, as described in the Draft EIR.

Rationale for Finding

Under Alternative 1, the existing uses would remain on the Project Site and no new development would occur. As such, Alternative 1 would not meet the Project's underlying purpose or any of its objectives. Specifically, Alternative 1 would not meet the underlying purpose of the Project, which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and support growing industries located within the Palms–Mar Vista–Del Rey community.

Reference

Section V, Alternatives, of the Draft EIR.

Alternative 2— Same FAR/Reduced Height Alternative

Description of Alternative

Alternative 2 would replace the entirety of the 118,141 square feet of existing office and accessory uses within the Project site with a total of 287,381 square feet of new floor area, including 283,981 square feet of office uses and 3,400 square feet of ground floor retail space. The new building would cover the entire Project site and would be five stories and approximately 84 feet in height to the top of the parapet (a reduction of 51 feet when compared to the Project's height of 135 feet). The new office uses would be developed in a single three-story office building atop a two-story podium structure that would contain the ground floor commercial uses and approximately 583 parking spaces. Overall, this alternative would remove all existing uses on the Project site resulting in approximately 169,240 square feet of net new floor area, the same amount as the Project. Similar to the Project, the FAR would be 1.46:1. However, the entire Project Site would be rebuilt, the existing office building at 12541 W. Beatrice Street would not be retained, and the new building would be constructed over the entire Project Site, thus reducing the height of the western element of the Project while increasing the height and mass of the eastern element.

Impact Summary

Alternative 2 would not avoid the Project's significant and unavoidable on-site and off-site noise and vibration impacts (pursuant to the significance criteria for human annoyance), and actually could result in greater construction noise impacts. Alternative 2 would reduce the Project's less-than-significant toxic air contaminants impacts while increasing the Project's operational GHG emissions, although such impacts would remain less than significant. All other impacts would be similar to those of the Project. Finally, Alternative 2 involves demolition of all structures currently on the Project site and 287,381 square feet of new construction and thus is generally more wasteful than the Project, which would retain the building at 12541 Beatrice Street and integrate it into a new campus with 199,500 square feet of new construction.

Finding

The City finds, pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment

opportunities for highly trained workers, make infeasible Alternative 2, as described in the Draft EIR.

Rationale for Finding

Alternative 2 would not meet the underlying purpose of the Project which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and support growing industries in the Community Plan area. With the same mix of uses and similar design elements, Alternative 2 would meet the following Project objectives.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;
- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;
- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities;
- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region; and
- Offer flexible combinations of spaces to accommodate a variety of different tenants.

Alternative 2 would not meet the following Project objectives due to the demolition of the existing building at 12541 Beatrice Street under this alternative.

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site; and
- Enhance the appearance of the immediate area by providing architecturally interesting and varied design.

Reference

Section V, Alternatives, of the Draft EIR.

Alternative 3—Reduced Development Intensity Alternative

Description of Alternative

Alternative 3 would reduce the new floor area proposed under the Project by 25 percent. Specifically, like the Project, Alternative 3 would retain the existing 87,881-square-foot office

building on the eastern portion of the Project site, and would replace the existing office building and accessory structures on the western portion of the Project site with a total of 127,655 square feet of new floor area, including 125,155 square feet of office uses and 2,500 square feet of ground floor retail space. The new building would be seven stories and approximately 114 feet in height to the top of the parapet (a reduction of one story and 21 feet when compared to the Project's height of eight stories and 135 feet). The new office uses would be developed in four floors (three full and one partial) atop a three-story podium structure that would contain the ground floor commercial uses and approximately 447 parking spaces. Overall, this alternative would result in approximately 103,100 square feet of net floor area compared to the Project's 169,240 square feet of net floor area and would result in a FAR of 1.10:1.

Impact Summary

Alternative 3 would not avoid the Project's significant and unavoidable on-site and off-site noise and vibration impacts (pursuant to the significance criteria for human annoyance). In addition, this alternative would result in greater VMT impacts compared to the Project. Alternative 3 would reduce some of the less than significant impacts associated with the Project (i.e., visual character during operation, light and glare during operation, construction related toxic air contaminants, operational air quality and GHG emissions, cultural resources, energy efficiency, paleontological resources, operational noise and vibration, public services, tribal cultural resources, and utilities). All other impacts would be similar to those of the Project.

Finding

The City finds, pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible Alternative 3, as described in the Draft EIR.

Rationale for Finding

Alternative 3 would include the same uses proposed by the Project while reducing the amount of total new floor area by approximately 25 percent. Alternative 3 would partially meet the underlying purpose of the Project which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community. Alternative 3 would also meet the following Project objectives, although it would not do so as effectively or to the same degree as the Project owing to the reduced amount of development under this alternative.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;
- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the

development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site;
- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities;
- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region;
- Enhance the appearance of the immediate area by providing architecturally interesting and varied design; and
- Offer flexible combinations of spaces to accommodate a variety of different tenants.

Reference

Section V, Alternatives, of the Draft EIR.

Alternative 4—Mixed-Use Office and Housing Alternative

Description of Alternative

Alternative 4 would develop the Project site with a mix of office and residential uses. Specifically, Alternative 4, like the Project, would retain the existing 87,881-square-foot office building on the eastern portion of the Project site, and would replace the existing office building and accessory structures at 12575 Beatrice Street. The new building would include a total of 199,500 square feet of floor area, the same floor area proposed by the Project, including 144,000 square feet of office uses on three levels and 55,500 square feet (55 units) of residential uses on a single top floor level. The office and residential uses would be developed atop three above-grade levels of parking. With regard to vehicular parking, Alternative 4 would provide a total of 548 parking spaces. The new building would be seven stories and approximately 114.5 feet in height to the top of the parapet (a reduction of one story and 20.5 feet when compared to the Project's height of eight stories and 135 feet). Overall, Alternative 4 would construct 199,500 square feet of new floor area within the Project site, similar to the Project, and would result in a FAR of 1.46:1, as with the Project.

Impact Summary

Alternative 4 would not avoid the Project's significant and unavoidable noise and vibration impacts (human annoyance). Alternative 4 would reduce several of the less than significant and less than significant with mitigation impacts associated with the Project (i.e., visual character during operation, construction related toxic air contaminants, operational air quality and GHG emissions, cultural resources, paleontological resources, VMT, energy efficiency during operation, operational vibration, tribal cultural resources, and water infrastructure). However, Alternative 4

would result in greater impacts associated with land use, operational outdoor noise, and public services during operation compared to the Project; however, these impacts would remain less than significant. All other impacts would be similar to those of the Project.

Finding

The City finds, pursuant to PRC Section 21081(a)(3), that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the Alternative 4, as described in the Draft EIR.

Rationale for Finding

Alternative 4 would add a residential component, eliminate the 3,400 square feet of ground floor commercial space proposed under the Project, and would reduce the office uses proposed by the Project. Therefore, Alternative 4 would not meet the underlying purpose of the Project, which is to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community.

Alternative 4 also would not meet the following Project objectives to the same extent as the Project owing to the reduced amount of office space, the introduction of a residential element, and the elimination of ground floor commercial space proposed under the Project.

- Support the Community Plan's Goal 2 to build a strong and competitive commercial sector which promotes economic vitality and serves the needs of the community through the redevelopment and replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector;
- Provide significant employment opportunities in office, research, and creative development uses, which will benefit the community, city, and region;
- Enhance the appearance of the immediate area by providing architecturally interesting and varied design; and
- Offer flexible combinations of spaces to accommodate a variety of different tenants.

Alternative 4 would not meet the following Project objectives owing to the elimination of ground floor commercial space proposed under the Project and the addition of the residential component.

- Create an interactive creative office campus with open space, shared amenities and landscaping while retaining an existing office building on site;
- Promote the Community Plan's Objective 2-1 to provide opportunities for new commercial development and services within existing commercial areas through the

development of a commercial project that would strengthen the economic vitality of the area without introducing incompatible uses;

- Activate the property and the neighborhood by providing retail components, including a café, attractive street-level landscaping, bicycle parking, public gathering spaces, and pedestrian amenities.

Reference

Section V, Alternatives, of the Draft EIR.

Alternatives Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives to the Project that were considered and rejected as infeasible include the following:

Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.I, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant and unavoidable construction-related noise impacts related to on-site and off-site construction activities, and significant and unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. The following potential alternatives were considered to avoid or substantially lessen the Project's significant and unavoidable construction-related noise and vibration impacts:

- Alternative (a)—Extended Construction Duration: This alternative considers extending the construction period, thus reducing the amount of daily construction activity that would occur under the Project. This alternative was evaluated and rejected as follows:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). With an extended construction duration, the number of on-site construction equipment and off-site construction trips would be reduced. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks trips) would reduce the construction-related noise levels by approximately 3 dBA (just perceptible).¹ A 50-percent reduction in construction truck trips during site

¹ The reference to 3 dBA here and in other parts of the discussion of the noise alternatives considered does not have to do with how much construction noise levels need to be reduced to avoid significant impacts. Rather, it has to do with: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent is required to result in an audible reduction in on- and off-site construction noise,

grading/excavation, which is the peak period of construction with the highest number of construction trucks, from 150 to 75 truck trips per hour (refer to Table IV.I-7 in Section IV.I, Noise, of the Draft EIR), would reduce the truck noise along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard to 62.7 dBA L_{eq} , 61.8 dBA L_{eq} , 60.1 dBA L_{eq} and 59.7 dBA L_{eq} , (an approximately 3-dBA reduction as compared to the Project), respectively. However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks), the actual noise levels would only be reduced by 2.3 dBA along Beatrice Street and Westlawn Avenue; 2.0 dBA along Grosvenor Boulevard; and 0.2 dBA along Jefferson Boulevard. In addition, a 50 percent reduction in construction truck trips during the mat foundation phase, from 300 to 150 truck trips per hour, would reduce the truck noise along Beatrice Street, Westlawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard to 64.4 dBA L_{eq} , 63.5 dBA L_{eq} , 61.7 dBA L_{eq} and 61.4 dBA L_{eq} (an approximately 3-dBA reduction as compared to the Project). Furthermore, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels would only be reduced by 2.6 dBA along Beatrice Street and Westlawn Avenue; 2.3 dBA along Grosvenor Boulevard; and 0.4 dBA along Jefferson Boulevard. Thus, as analyzed, even with a 50 percent reduction in truck trips, the off-site construction noise plus ambient noise would result in a minimal reduction in noise (i.e., less than the 3 dBA perceptible level) and the off-site noise impacts along Beatrice Street, Westlawn Avenue, and Grosvenor Boulevard would remain significant. This potential alternative would also increase the number of days by approximately 150 percent that sensitive receptors would be impacted by the off-site construction trucks, thereby prolonging the duration of the significant impact.

- With respect to on-site construction, a reduction in the number of pieces of construction equipment would also reduce noise levels compared to the Project (depending on the amount of reduction) but would still exceed the significance threshold. Specifically, reducing the on-site construction equipment during the site grading phase from 9 pieces to 4 pieces of equipment (approximately 55 percent) would reduce the construction noise at the off-site receptors by 3.8 dBA, 4.3 dBA, 4.1 dBA, 4.2 dBA and 3.8 dBA L_{eq} at receptor locations R1, R2, R3, R4 and R5, respectively. The estimated construction noise levels with a 55 percent reduction in the number of construction equipment would still exceed the significance threshold by up to 19.1 dBA L_{eq} and 23.1 dBA L_{eq} at receptor locations R1 and R5, respectively. Therefore, the construction noise levels (both on- and off-site construction noise) under this approach would be somewhat less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. This approach would also increase the number of days that a sensitive receptor would be impacted by construction activities by at least 150 percent. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1 and R5 are directly across from the Project site), and the building height (i.e., 4-story residential buildings along Beatrice Street), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site and off-site construction noise impacts

respectively. In other words, reducing peak day construction activities by 50 percent would result in a barely audible reduction in construction noise.

under this approach would not be substantially less than the Project and would remain significant.

- The on-site construction vibration impacts (pursuant to the significance criteria for human annoyance) would be significant and unavoidable, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and under this approach, the same construction equipment would be used. In addition, off-site construction vibration impacts (pursuant to the significance criteria for human annoyance) due to heavy trucks traveling by sensitive receptors would also continue to be significant and unavoidable, similar to the Project, as the trucks would generate the same vibration levels for an extended construction duration.
- Alternative (b)—Central Location of Development: This alternative would involve locating the proposed development closer to the center of the Project site, thus pulling back the proposed development and associated construction activities from the property line, creating more distance between the construction activities and off-site sensitive receptors. This approach was reviewed and rejected for the following reasons:
 - Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would generally attenuate approximately 6 dBA per doubling of distance from the noise source (construction equipment) to the receptor over acoustically “hard” sites (e.g., asphalt and concrete surfaces) and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically “soft” sites (e.g., soft dirt, grass or scattered bushes and trees). While the on-site construction noise levels associated with the building construction placed closer to the center of the Project site could be reduced compared to the Project, the noise level reduction, depending upon the setback from the property line, would be limited due to the size of the Project site (approximately 250 feet from east to west property lines and 310 feet from north to south property lines). For example, shifting the proposed building approximately 60 feet to the north and east of the property lines would reduce the construction noise levels (during the building construction phase) by approximately 4.9 dBA and 4.4 dBA at receptor locations R1 and R5, respectively. The construction noise levels during the building phase would still exceed the significance threshold by 13.7 dBA and 18.4 dBA at receptors R1 and R2, respectively. However, noise levels during the site demolition, site preparation and grading would be similar to the Project; as construction activities for these phases would be up to the property line, similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant and unavoidable and similar to the Project.
 - Similar to the Project, the on-site construction vibration impacts (pursuant to the significance criteria for human annoyance) of this potential alternative would remain significant, as heavy construction equipment (e.g., drill rig and large bulldozer) used for the site grading would still operate near the property line and adjacent to sensitive uses. Also similar to the Project, the off-site construction vibration impacts (pursuant to the significance criteria for human annoyance) of this potential alternative would remain significant as heavy trucks would similarly travel by sensitive receptors.

Based on the above, neither of the above potential alternative options related to reduced construction activities would avoid or substantially lessen the significant and unavoidable construction-related on-site and off-site noise and vibration (human annoyance) impacts of the Project. This is because the significant and unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Therefore, none of the above alternatives would avoid or substantially lessen the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

Alternative Project site: The Project's underlying purpose and objectives are intimately tied to the concept of improving existing operations on the Project site by creating an integrated office campus. Thus, an alternative location would not meet the underlying purpose of the Project to redevelop the infill Project site with an integrated office campus that would generate new economic opportunities and supporting growing industries located within the Palms–Mar Vista–Del Rey community. Development on an alternative site would result in no changes to existing on-site conditions, which would therefore provide no potential to achieve the basic Project objectives related to the replacement of an older industrial building with a modern commercial building that will respond to the evolving needs of a growing creative office commercial sector. In addition, the Project Applicant already owns the Project site, and it is unlikely that the Applicant would be able to reasonably acquire, control, or have access to an alternative site with similar uses and square footage. Furthermore, it would be expected that if development of the Project were to occur at an alternative site within a similar urban environment where the site would similarly be located in close proximity to noise and vibration sensitive uses, the significant and unavoidable impacts of the Project would also occur. Furthermore, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project site. Therefore, an alternative site is not considered feasible as it would fail to achieve the underlying purpose and related objectives of the Project. In addition, an alternative site would likely not avoid the Project's significant impacts. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would avoid all of the Project's significant environmental impacts.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Reduced Development Intensity Alternative, would be the Environmentally Superior Alternative. As discussed above, Alternative 3 would provide a total of 127,655 square feet of new floor area, including 125,155 square feet of office and 2,500 square feet of ground floor commercial (retail) uses. Although Alternative 3 would not eliminate the Project's significant and unavoidable noise and vibration impacts and would result in greater transportation impacts compared to the Project (due to reduced mixed-use trip reduction factors associated with the reduced office that result in a slightly greater average VMT per employee), this alternative would reduce several of the less than significant and less than significant with mitigation impacts associated with the Project (i.e., visual character during operation, light and glare during operation, construction related toxic air contaminants, operational air quality and GHG emissions, energy efficiency, operational noise and vibration, public services during operation, and utilities). All other impacts would be similar to those of the Project. Thus, of the range of alternatives analyzed, Alternative 3, the Reduced Development Intensity Alternative, would be the Environmentally Superior Alternative.

While Alternative 3 would be the Environmentally Superior Alternative, it is noted that with the reduction in size and uses, this alternative would only partially meet the underlying purpose of the Project and the associated Project objectives, and would not be economically feasible.

IX. Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines indicates that an EIR should evaluate any significant irreversible environmental changes that would occur should the proposed project be implemented. The types and level of development associated with the Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. The Project site contains no energy resources that would be precluded from future use through Project implementation. For the reasons set forth in Section VI, Other CEQA Considerations, of the Draft EIR, the Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant, and the limited use of nonrenewable resources is justified.

Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

The Project's potential impacts related to solid waste are addressed in the Initial Study prepared for the Project, which is included as Appendix A of the Draft EIR. As discussed therein, during

construction of the Project, a minimum of 75 percent of construction and demolition debris would be diverted from landfills. In addition, during operation, the Project would provide on-site recycling containers within a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. In accordance with Assembly Bill (AB) 1826, the Project would also provide for the recycling of organic waste. The Project would adhere to State and local solid waste policies and objectives that further goals to divert waste. Thus, the consumption of non-renewable building materials, such as aggregate materials and plastics, would be reduced with compliance with the State and local solid waste policies.

Water

Consumption of water during construction and operation of the Project is addressed in the Initial Study prepared for the Project, which is included as Appendix A of the Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the City of Los Angeles Department of Water and Power (LADWP). Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, the Project would implement a variety of sustainable features related to water conservation to reduce indoor water use, as set forth in Section II, Project Description, of the Draft EIR, including, but not limited to, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation systems, and water-efficient landscaping. Furthermore, the Project would be required to reduce indoor water use by at least 20 percent in accordance with the City of Los Angeles Green Building Code. Thus, as evaluated in the Initial Study prepared for the Project, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in the wasteful, inefficient, and unnecessary consumption of water.

Energy Consumption

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and, thus, the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.D, Energy, of the Draft EIR. As discussed therein, construction activities for the Project would not require the consumption of natural gas but would require the use of fossil fuels and electricity. Trucks and equipment used during Project construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Further, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to federal fuel efficiency requirements. Furthermore, as detailed in Section IV.D, Energy, of the Draft EIR, the electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When

not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

During operation, the Project's increase in electricity demand would be within the anticipated service capabilities of LADWP. As provided in Section IV.D, Energy, of the Draft EIR, the buildout of the Project is projected to generate a net decrease in the on-site demand for natural gas assuming compliance with Title 24 standards and applicable CALGreen and City of Los Angeles Code requirements (e.g., requires all new buildings be all-electric buildings with some exceptions). As the Project's natural gas consumption results in a decrease in the onsite demand for natural gas, the Project would be consistent with the forecasted 2025 consumption in SoCalGas' planning area. In addition, as discussed in Section IV.D, Energy, of the Draft EIR, the Project would be consistent with energy conservation policies and plans relevant to the Project, including the California Title 24 energy standards, the CALGreen Code, the City of Los Angeles Green Building Code, City of Los Angeles Green New Deal, and SCAG's 2020–2045 RTP/SCS. Such requirements of Title 24, CALGreen Code, and Green Building Code include, but are not limited to, specific lighting requirements to conserve energy, window glazing to reflect heat, enhanced insulation to reduce heating and ventilation energy usage, and enhanced air filtration. The Project would implement these measures as required by the applicable code. The Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies. The Project would comply with Los Angeles Green Building Code, including Section 95.05.211, which requires that the Project provide at minimum 3,300 square feet of roof area reserved for a solar photovoltaic system. In addition, the Project would incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including Project Design Feature GHG-PDF-1, as discussed above and included in Section IV.F, Greenhouse Gas Emissions, of the Draft EIR.

As included in Section IV.D, Energy, of the Draft EIR, gasoline and diesel fuel consumption during operation would account for 0.007 percent of gasoline and 0.006 percent of diesel fuel consumption in Los Angeles County in 2025. The Project includes a number of features that would reduce the number of VMT, such as increased density, a mixed-use development, and increased destination and transit accessibility.

Based on the above and as evaluated in detail in Section IV.D, Energy, and in Section M.2, Utilities and Service Systems—Energy Infrastructure, of the Draft EIR, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.D, Energy, of the Draft EIR, for further analysis regarding the Project's consumption of energy resources.

Environmental Hazards

The Project's potential use of hazardous materials is addressed in Section IV.G, Hazards and Hazardous Materials, of the Draft EIR. The Project site is located within a City-designated Methane Zone as defined by the City Methane Ordinance. Excavation and construction activities within the Project site that involve work in confined spaces on-site could pose a potential for methane and hydrogen sulfide build-up, resulting in a possible hazardous condition. Adherence to industry-standard construction safety measures, as well as compliance with California Occupational Safety and Health Act safety requirements, would serve to reduce the risk in the event that elevated levels of these soil gases are encountered during grading and construction. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used in office and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, paints, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials used during construction and operation would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be reduced to a less-than-significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

X. Growth-Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth, or increases in the population which may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Additionally, consideration must be given to characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

a. Population

As discussed in Section II, Project Description, of the Draft EIR, the Project would include the construction of new office and commercial uses. Since the Project does not propose a housing component, it would not directly induce a new residential population growth in the vicinity of the Project site or the Palms–Mar Vista–Del Rey Community Plan area.

b. Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. The Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. Project-related construction workers would not be anticipated to relocate their household's permanent place of residence as a consequence of working on the Project and, therefore, no new permanent residents are expected to be generated during construction of the Project. Accordingly, Project construction would not induce substantial population growth.

As discussed in the Initial Study included as Appendix A to the Draft EIR, the Project would generate an estimated total of 791 employees at buildout, for a net increase of 670 employees over existing conditions. Per the employment data from the 2020–2045 RTP/SCS, an estimated 1,887,969 employees are projected within the City of Los Angeles in 2020. In 2025, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,937,555 employees. Therefore, the projected employment growth in the City between 2020 and 2025 based on SCAG's 2020–2045 RTP/SCS is approximately 49,586 employees. The Project's net increase in employment (670 employees) would represent 1.4 percent of the growth between 2020 and 2025. Overall, the provision of new jobs would constitute a small percentage of the City's anticipated employment growth and would not be considered "unplanned growth."

Furthermore, while some new Project employees may be anticipated to relocate to the Project vicinity, many would not, nor would existing employees be expected to move as a result of redevelopment of the Project Site. Accordingly, this potential indirect increase in population would not be substantial. Specifically, some employment opportunities may be filled by people already residing in the vicinity of the Project Site, and it is anticipated that other employees would commute to the Project Site from other communities both in and outside of the City, as under existing conditions. Therefore, given that the Project would not directly contribute to substantial population growth in the Project area through the development of residential uses, and since many of the employment opportunities generated by the Project would be filled by people already residing in the Project vicinity or who would commute to the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Further, as the Project would be located in an urbanized area with an established network of roads and other urban infrastructure, the Project would not require the extension of such infrastructure in a manner that would indirectly induce substantial population growth.

c. Utility Infrastructure Improvements

The area surrounding the Project Site is already developed with a mix of residential, commercial, and industrial uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project would require local infrastructure upgrades to improve fire flow and connections to

existing water, sewer, electricity, and natural gas lines on-site and in the immediate vicinity of the Project site, such improvements would be limited to serving Project-related demand and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level. In addition, the Project would not require any major roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project site, to improve safety and walkability, and/or provide Americans with Disabilities Act (ADA) access.

d. Conclusion

Overall, the Project would be consistent with the growth forecast for SCAG's City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements or open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

XI. Energy Conservation

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. Specifically, the Project would support environmental sustainability by incorporating sustainable building features and construction protocols required by the Los Angeles Green Building Code (LAMC Chapter IX, Article 9), the California Green Building Standards Code (California Code of Regulations, Title 24, Part 11; referred to as the CALGreen Code), and the California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6; California Energy Code), pursuing U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)[®] Silver certification or equivalent green building standards. The Project represents an infill development that also involves the re-use of an existing buildings. The Project would incorporate, but would not be limited to: Energy Star appliances; plumbing fixtures and fittings that comply with the performance requirements specified in the Los Angeles Green Building Code; weather-based irrigation systems; water-efficient plantings with drought-tolerant species; shade trees in public areas; green walls in some outdoor areas; vegetated roofs or cool roof systems to help reduce energy use; short- and long-term bicycle parking; electric vehicle (EV) charging infrastructure; a TDM Program; use of daylighting where feasible; energy-efficient lighting; and permeable paving where appropriate

XII. Statement of Overriding Considerations

The EIR identifies unavoidable significant impacts that would result from implementation of the Project. PRC Section 21081 and CEQA Guidelines Section 15093(b) provide that when a decision of a public agency allows the occurrence of significant impacts that are identified in the EIR, but are not at least substantially mitigated to an insignificant level or eliminated, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. The State CEQA Guidelines require, pursuant to CEQA Guidelines Section 15093(b), that

the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects have been identified in the EIR that cannot be substantially mitigated to an insignificant level or be eliminated. These findings and the Statement of Overriding Considerations are based on the documents and materials that constitute the record of proceedings, including, but not limited to, the Final EIR and all technical appendices attached thereto.

Based on the analysis provided in Section IV, Environmental Impact Analysis, of the Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to on-site and off-site noise and vibration (pursuant to the significance criteria for human annoyance) during construction.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible the alternatives to the Project discussed above, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City hereby finds that each of the Project's benefits, as listed below, outweigh and override the significant unavoidable impacts relating to on-site and off-site noise and vibration (pursuant to the significance criteria for human annoyance) during construction.

The below stated reasons summarize the benefits, goals and objectives of the Project, and provide the detailed rationale for the benefits of the Project. These overriding considerations of economic, social, aesthetic, and environmental benefits for the Project justify adoption of the Project and certification of the completed EIR. Each of the listed project benefits set forth in this Statement of Overriding Considerations provides a separate and independent ground for the City's decision to approve the Project despite the Project's identified significant and unavoidable environmental impacts. Each of the following overriding consideration separately and independently (i) outweighs the adverse environmental impacts of the Project, and (ii) justifies adoption of the Project and certification of the completed EIR. In particular, achieving the underlying purpose for the Project would be sufficient to override the significant environmental impacts of the Project.

1. The Project would support the Palms–Mar Vista–Del Rey Community Plan's objective to provide opportunities for new commercial development and services within existing commercial areas through the development of a commercial project that would strengthen the economic vitality of the area without the need for zoning amendments and without introducing incompatible uses.
2. The Project would support the growth of the City's economic base by creating jobs in both Project construction and operation. The Project would create commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs, which would also increase the Project area employment population to support local businesses.
3. The Project would create an integrated creative office campus with open space, shared amenities and landscaping, while retaining an existing office and studio building on the Project Site.

4. The Project would activate the Project Site and neighborhood by providing retail components, including a ground floor café, attractive street-level landscaping in ample setbacks, bicycle parking, and pedestrian amenities.
5. The Project would provide significant employment opportunities in office, research, and commercial uses, including media, arts, and design development, which will benefit the community, city, and region.
6. The Project will bring a first-class, architecturally designed building and campus to revitalize a commercial area adjacent to the Playa Vista neighborhood.

General Findings

1. The City, acting through the Department of City Planning, is the “Lead Agency” for the Project evaluated in the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Project, that the Draft EIR which was circulated for public review reflected its independent judgment and that the Final EIR reflects the independent judgment of the City.
2. The EIR evaluated the following potential project and cumulative environmental impacts: aesthetics, air quality, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, public services (fire and police protection), transportation, tribal cultural resources, and utilities and service systems (water, wastewater, and energy infrastructure). Additionally, the EIR considered, in separate sections, Significant Irreversible Environmental Changes and Growth Inducing Impacts. The significant environmental impacts of the Project and the alternatives were identified in the EIR.
3. The City finds that the EIR provides objective information to assist the decision makers and the public at large in their consideration of the environmental consequences of the Project. The public review periods provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review periods and responds to comments made during the public review periods.
4. Textual refinements and errata were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with Project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated to describe refinements suggested as part of the public participation process.
5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned

responses to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

6. The Final EIR documents changes to the Draft EIR. Having reviewed the information contained in the Draft EIR, the Final EIR, and the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there is no new significant impact, substantial increase in the severity of a previously disclosed impact, significant new information in the record of proceedings or other criteria under CEQA that would require additional recirculation of the Draft EIR, or that would require preparation of a supplemental or subsequent EIR. Specifically, the City finds that:
 - The Responses to Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.
 - The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that recirculation of the EIR is not required.
 - None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the Project constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.
 - The mitigation measures identified for the Project were included in the Draft EIR and Final EIR. The final mitigation measures for the Project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the MMP is incorporated into the Project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.
7. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and revised in the MMP as adopted

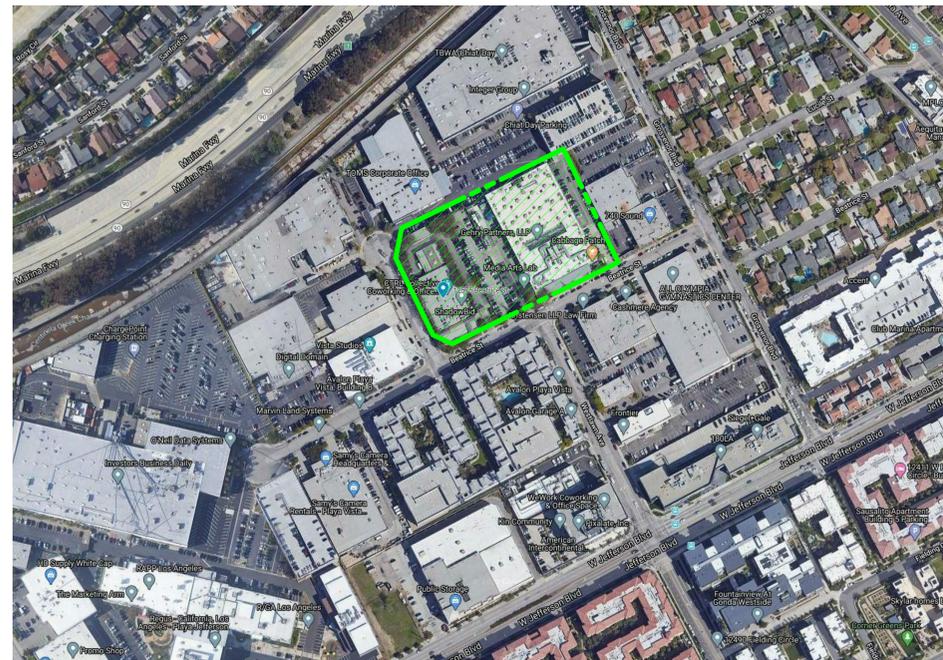
by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of PRC Section 21081.6, the City hereby adopts the MMP.

8. In accordance with the requirements of PRC Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.
9. The custodian of the documents or other materials which constitute the record of proceedings upon which the City decision is based is the City of Los Angeles, Department of City Planning.
10. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.
11. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the Project.
12. The EIR is a project EIR for purposes of environmental analysis of the Project. A project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the project by the City and the other regulatory jurisdictions.

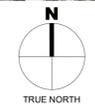
EXHIBIT A
PROJECT PLANS
ENV-2020-3533-EIR
MARCH 13, 2025

DRAWING INDEX

SHEET #	SHEET TITLE	SCALE	DATE	ISSUE	EFS DOCUMENTATION FOR CPD CASE FILING
01	SHADOW ANALYSIS		11.17.18		
02	SHADOW ANALYSIS				
03	SHADOW ANALYSIS				
A0-0.0	COVER SHEET				
A1-1.0	DRAWING INDEX, PROJECT SUMMARY, MASTER LAND USE APPLICATION REQ., VICINITY PLAN, SITE PLAN - EXISTING				
A1-1.1	SITE PLAN - PROPOSED	1/32" = 1'-0"			
A2-1.1	FLOOR PLANS - LEVEL 00, LEVEL 0	1/32" = 1'-0"			
A2-1.2	FLOOR PLANS - LEVEL 1, LEVEL 2	1/32" = 1'-0"			
A2-1.3	FLOOR PLANS - LEVEL 3, LEVEL 4	1/32" = 1'-0"			
A2-1.4	FLOOR PLANS - LEVEL 5, LEVEL 6	1/32" = 1'-0"			
A2-1.5	FLOOR PLANS - LEVEL 7, LEVEL 8	1/32" = 1'-0"			
A2-1.6	FLOOR PLANS - ROOF PLAN	1/32" = 1'-0"			
A2-1.7	TYPICAL CIRCULATION PLANS	1/32" = 1'-0"			
A2-1.8	TYPICAL LANDSCAPE PLAN - LEVEL 6	1/16" = 1'-0"			
A2-2.1	ENLARGED PLAN	1/8" = 1'-0"			
A2-2.2	ENLARGED PLAN	1/8" = 1'-0"			
A2-2.3	ENLARGED PLAN	1/8" = 1'-0"			
A2-2.4	ENLARGED PLAN	1/8" = 1'-0"			
A3-1.1	ELEVATIONS - NORTH & SOUTH	1/32" = 1'-0"			
A3-1.2	ELEVATIONS - EAST & WEST	1/32" = 1'-0"			
A3-2.1	SECTIONS	1/16" = 1'-0"			



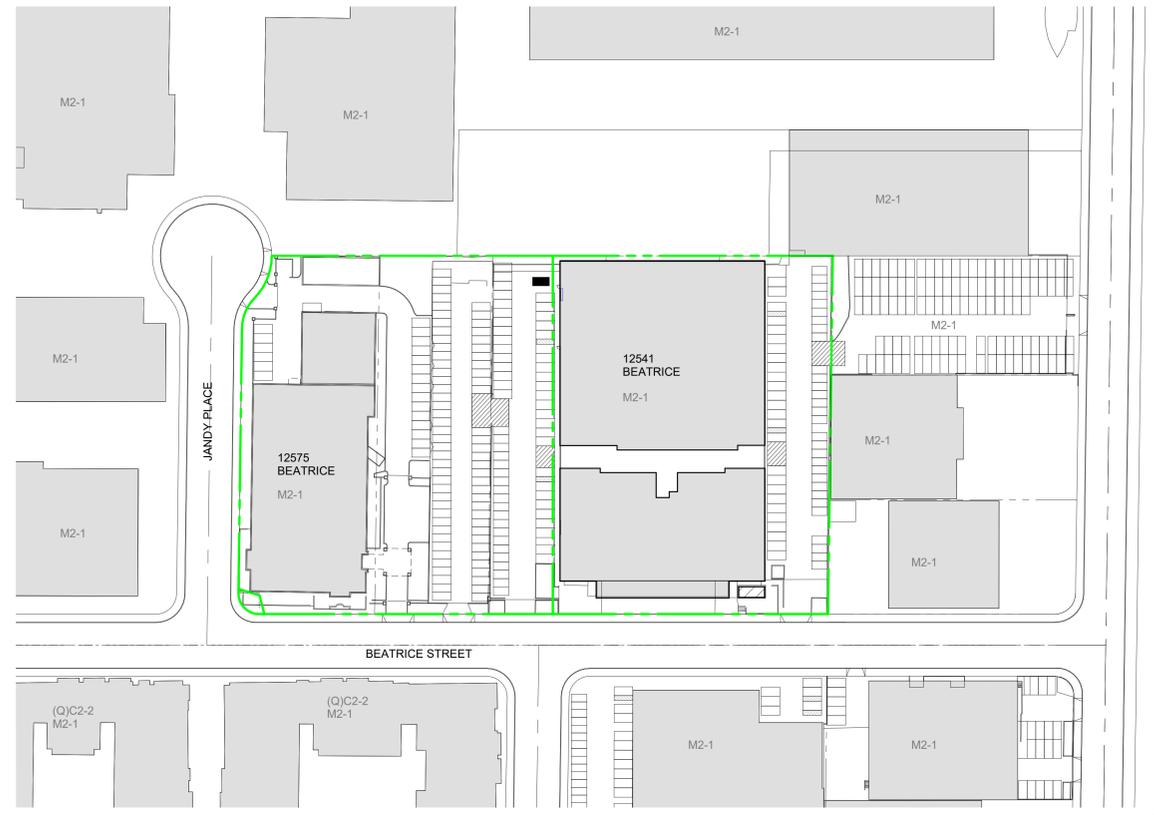
1 VICINITY MAP
1/2" = 1'-0"



PROJECT SUMMARY

12575 BEATRICE					12541 BEATRICE				PARKING REQUIRED				PARKING / BICYCLE SPACES PROVIDED			
LEVEL	OFFICE	CAFE	GENERAL RETAIL	PARKING AREA	OFFICE	PARKING AREA	HARDSCAPE	LANDSCAPE	OFFICE 1:500 SF	CAFE 1:100 SF	RETAIL 1:500 SF	TOTAL PARKING REQUIRED	TOTAL PARKING PROVIDED	BICYCLE SPACES SHORT-TERM	BICYCLE SPACES LONG-TERM	HEIGHT ABOVE ANG (FT)
L00	-	-	-	71,532 SF	-	-	-	-	-	-	-	-	179	-	-	+0 / +5
L1	-	1,300 SF	2,100 SF	73,775 SF	87,881 SF	10,000 SF	20,690 SF	17,069 SF	176	13	4	193	173	22	41	+5 / +15
L2	-	-	-	106,877 SF	-	-	-	-	-	-	-	-	145	-	-	+15 / +25
L3	-	-	-	80,883 SF	-	-	-	-	-	-	-	-	177	-	-	+25 / +35
L4	53,583 SF	-	-	80,883 SF	-	-	8,303 SF	3,312 SF	108	-	-	121	-	-	-	+35 / +55
L5	49,806 SF	-	-	-	-	-	2,103 SF	2,358 SF	100	-	-	105	-	-	-	+55 / +75
L6	45,222 SF	-	-	-	-	-	3,652 SF	1,029 SF	90	-	-	89	-	-	-	+75 / +95
L7	36,776 SF	-	-	-	-	-	5,739 SF	2,994 SF	74	-	-	59	-	-	-	+95 / +115
L8	10,713 SF	-	-	-	-	-	14,096 SF	11,271 SF	21	-	-	20	-	-	-	+115 / +135
TOTAL	196,100 SF	1,300 SF	2,100 SF	413,950 SF	87,881 SF	10,000 SF	54,583 SF	38,033 SF	569	13	4	586	811	22	41	

- GENERAL RETAIL IS <5% OF THE TOTAL GROSS AREA.
- AT-GRADE PARKING ON EAST SIDE OF 12541 BEATRICE ST.
- TOTAL COMBINED OFFICE AREA AT 12575 AND 12541 BEATRICE STREET = 283,881 SF.
- LANDSCAPE AND HARDSCAPE AREAS INCLUDE NEW CONSTRUCTION AT 12575 BEATRICE ST. AND AT-GRADE IMPROVEMENTS AT 12541 BEATRICE ST.



2 SITE PLAN - EXISTING
1/64" = 1'-0"



NEW BEATRICE WEST
12575 BEATRICE STREET

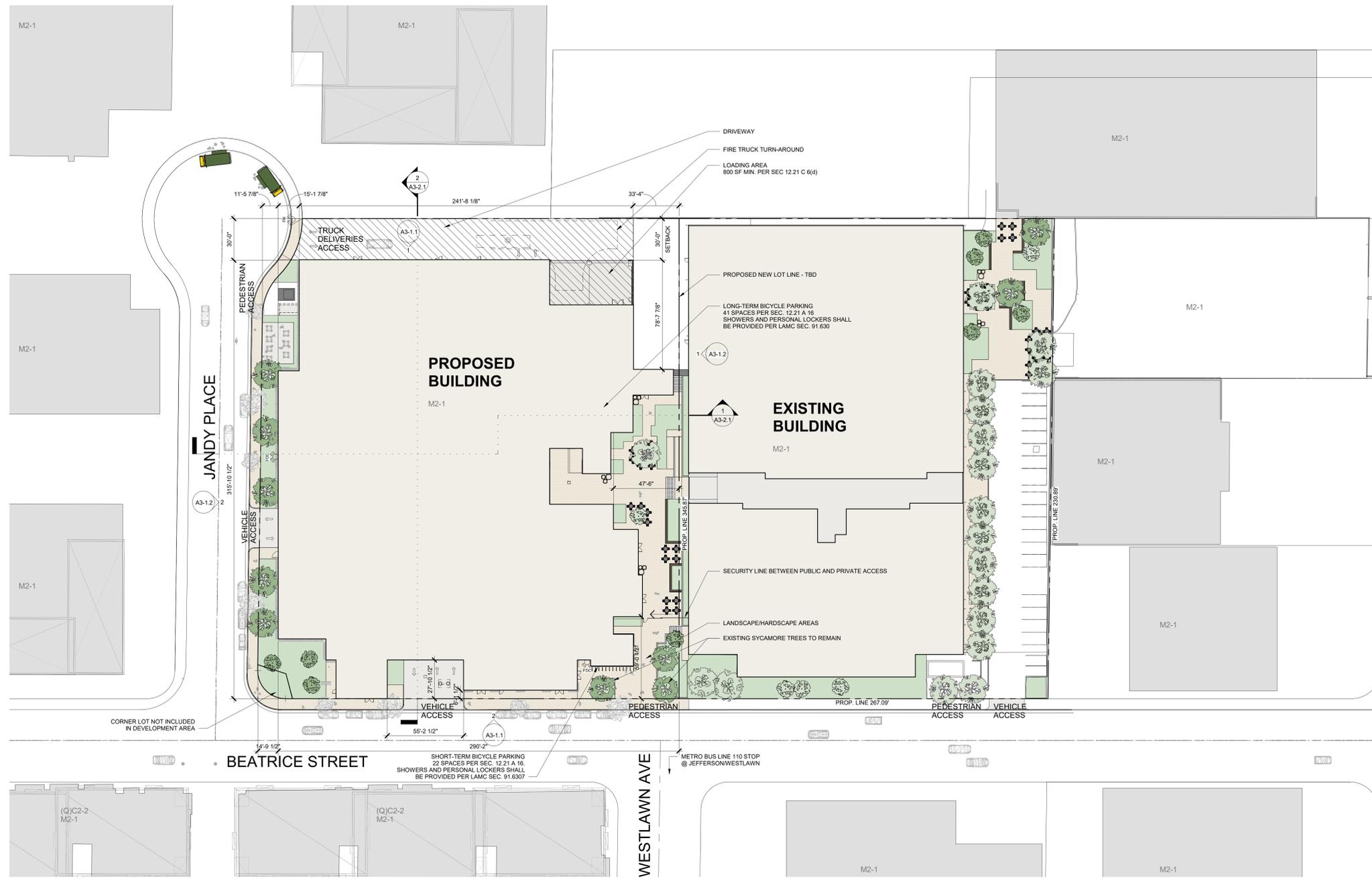
DRAWING INDEX,
PROJECT SUMMARY,
MASTER LAND USE
APPLICATION REQ.,
VICINITY PLAN, SITE
PLAN - EXISTING

PROJECT NO. 2014-019
DATE As indicated
DRAWN BY Author
DATE 02/18/2020
SHEET NUMBER **A1-1.0**

PROJECT SUMMARY

12575 BEATRICE					12541 BEATRICE				PARKING REQUIRED				PARKING / BICYCLE SPACES PROVIDED			
LEVEL	OFFICE	CAFE	¹ GENERAL RETAIL	PARKING AREA	OFFICE	PARKING AREA	⁴ HARDSCAPE	⁴ LANDSCAPE	OFFICE 1:500 SF	CAFE 1:100 SF	¹ RETAIL 1:500 SF	TOTAL PARKING REQUIRED	TOTAL PARKING PROVIDED	BICYCLE SPACES SHORT-TERM	BICYCLE SPACES LONG-TERM	HEIGHT ABOVE ANG (FT)
L00	-	-	-	71,532 SF	-	-	-	-	-	-	-	-	179	-	-	-
L0	-	-	-	73,775 SF	-	-	-	-	-	-	-	-	173	22	41	+0 / +5
L1	-	1,300 SF	2,100 SF	106,877 SF	87,881 SF	² 10,000 SF	20,690 SF	17,069 SF	176	13	4	193	138	-	-	+5 / +15
L2	-	-	-	80,883 SF	-	-	-	-	-	-	-	-	145	-	-	+15 / +25
L3	-	-	-	80,883 SF	-	-	-	-	-	-	-	-	177	-	-	+25 / +35
L4	53,583 SF	-	-	-	-	-	8,303 SF	3,312 SF	108	-	-	121	-	-	-	+35 / +55
L5	49,806 SF	-	-	-	-	-	2,103 SF	2,358 SF	100	-	-	105	-	-	-	+55 / +75
L6	45,222 SF	-	-	-	-	-	3,652 SF	1,029 SF	90	-	-	88	-	-	-	+75 / +95
L7	36,776 SF	-	-	-	-	-	5,739 SF	2,994 SF	74	-	-	59	-	-	-	+95 / +115
L8	10,713 SF	-	-	-	-	-	14,096 SF	11,271 SF	21	-	-	20	-	-	-	+115 / +135
TOTAL	³ 196,100 SF	1,300 SF	2,100 SF	413,950 SF	³ 87,881 SF	10,000 SF	54,583 SF	38,033 SF	569	13	4	586	811	22	41	-

1. GENERAL RETAIL IS <5% OF THE TOTAL GROSS AREA.
2. AT-GRADE PARKING ON EAST SIDE OF 12541 BEATRICE ST.
3. TOTAL COMBINED OFFICE AREA AT 12575 AND 12541 BEATRICE STREET = 283,981 SF
4. LANDSCAPE AND HARDSCAPE AREAS INCLUDE NEW CONSTRUCTION AT 12575 BEATRICE ST. AND AT-GRADE IMPROVEMENTS AT 12541 BEATRICE ST.



1 SITE PLAN - PROPOSED
1/32" = 1'-0"



KEY PLAN

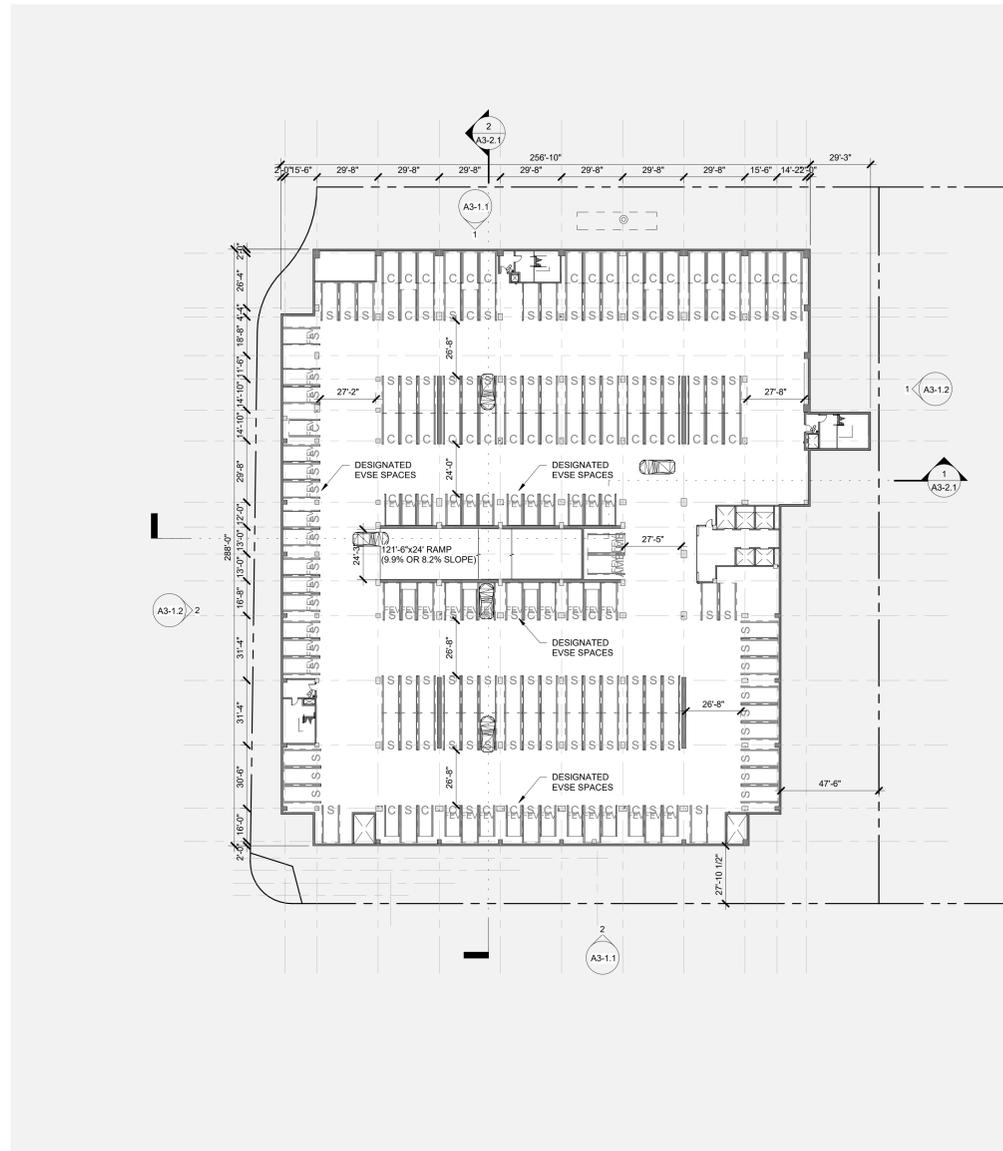
NEW BEATRICE WEST
12575 BEATRICE STREET

TITLE

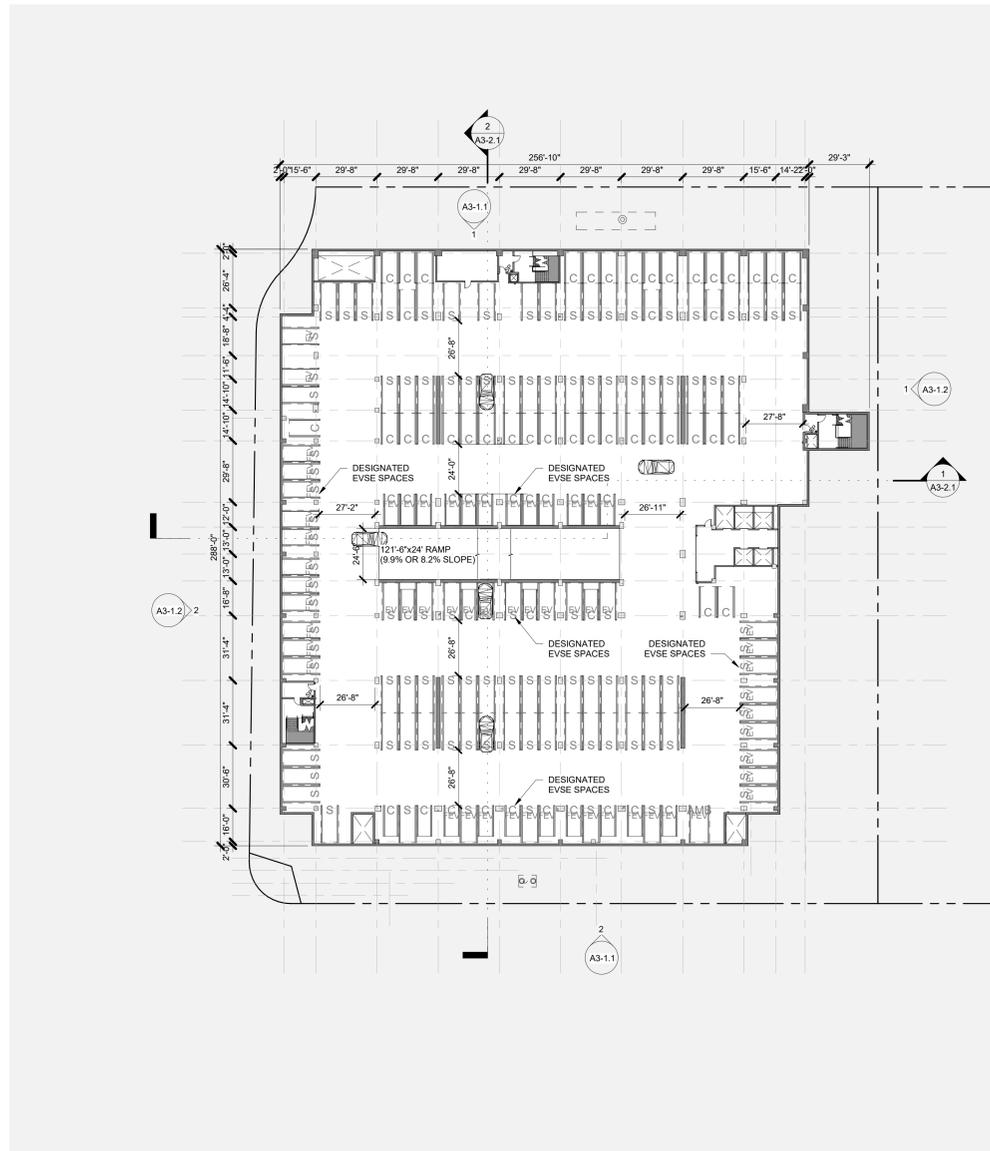
SITE PLAN -
PROPOSED

PROJECT NO.
2014-019
SCALE
1/32" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

SHEET NUMBER
A1-1.1



1 FLOOR PLAN - PARKING LEVEL 00
 1/32" = 1'-0"



2 FLOOR PLAN - PARKING LEVEL 0
 1/32" = 1'-0"

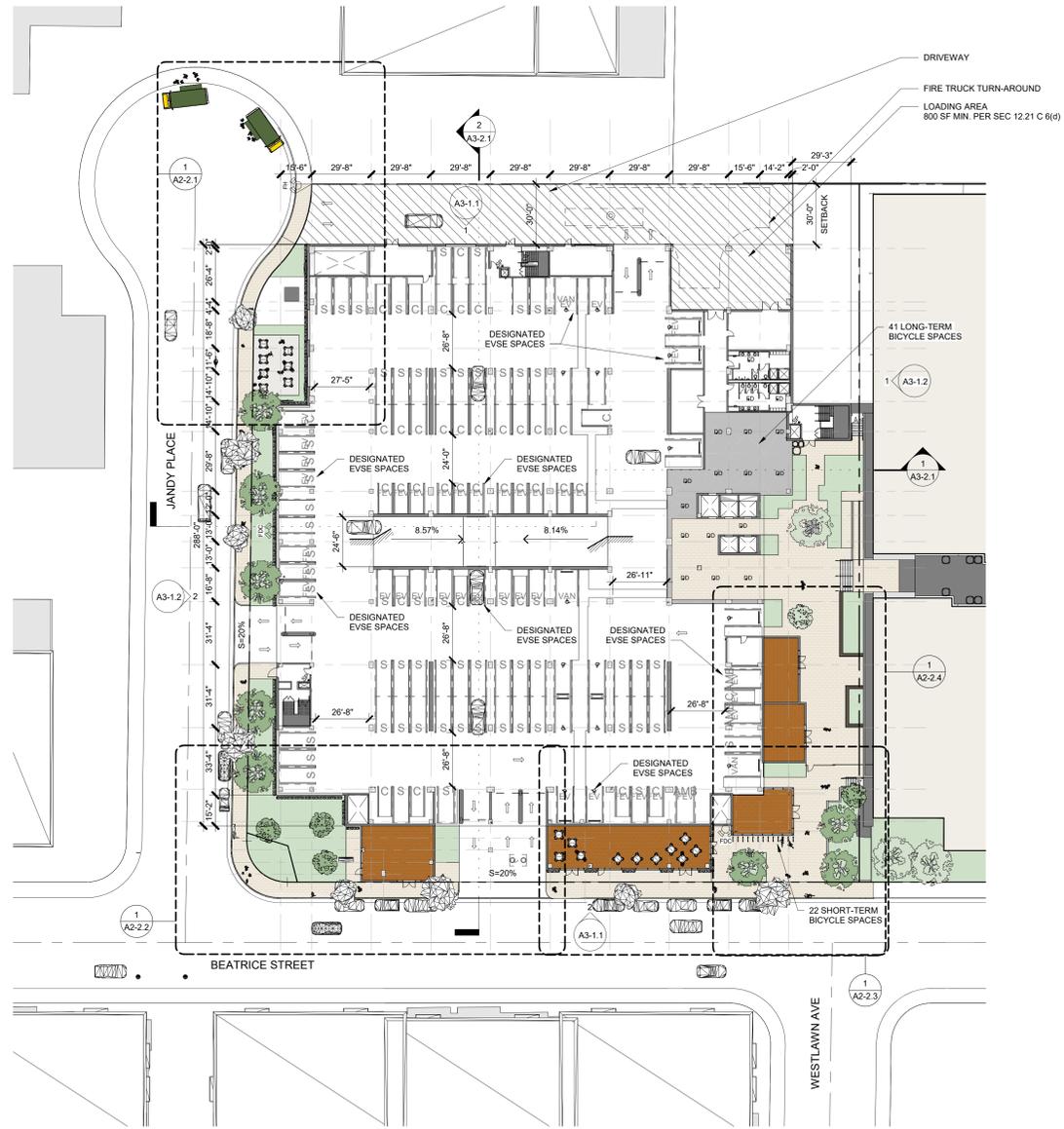
NEW BEATRICE WEST
 12575 BEATRICE STREET

TITLE

FLOOR PLANS - LEVEL
 00, LEVEL 0

2014-019
 1/32" = 1'-0"
 Author
 02/18/2020

A2-1.1



1 FLOOR PLAN - PARKING LEVEL 1 (GROUND)
1/32" = 1'-0"



2 FLOOR PLAN - PARKING LEVEL 2
1/32" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

FLOOR PLANS - LEVEL
1, LEVEL 2

2014-019
1/32" = 1'-0"
Author
02/18/2020

A2-1.2



1 FLOOR PLAN - PARKING LEVEL 3
1/32" = 1'-0"



2 FLOOR PLAN - LEVEL 4
1/32" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

FLOOR PLANS - LEVEL
3, LEVEL 4

2014-019
1/32" = 1'-0"
Author
02/18/2020

A2-1.3



1 FLOOR PLAN - LEVEL 5
1/32" = 1'-0"



2 FLOOR PLAN - LEVEL 6
1/32" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

FLOOR PLANS - LEVEL
5, LEVEL 6

PROJECT NO.
2014-019
SCALE
1/32" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

PROJECT NUMBER
A2-1.4



1 FLOOR PLAN - LEVEL 7
1/32" = 1'-0"



2 FLOOR PLAN - LEVEL 8
1/32" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

FLOOR PLANS - LEVEL
7, LEVEL 8

PROJECT NO.
2014-019
SCALE
1/32" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

PROJECT NUMBER
A2-1.5



1 ROOF PLAN
1/32" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

TITLE

FLOOR PLANS - ROOF
PLAN

PROJECT NO.
2014-019
SCALE
1/32" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

HEET NUMBER
A2-1.6



2 SOUTH BUILDING ELEVATION - BEATRICE ST.
1/16" = 1'-0"

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL



1 NORTH BUILDING ELEVATION
1/16" = 1'-0"

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL

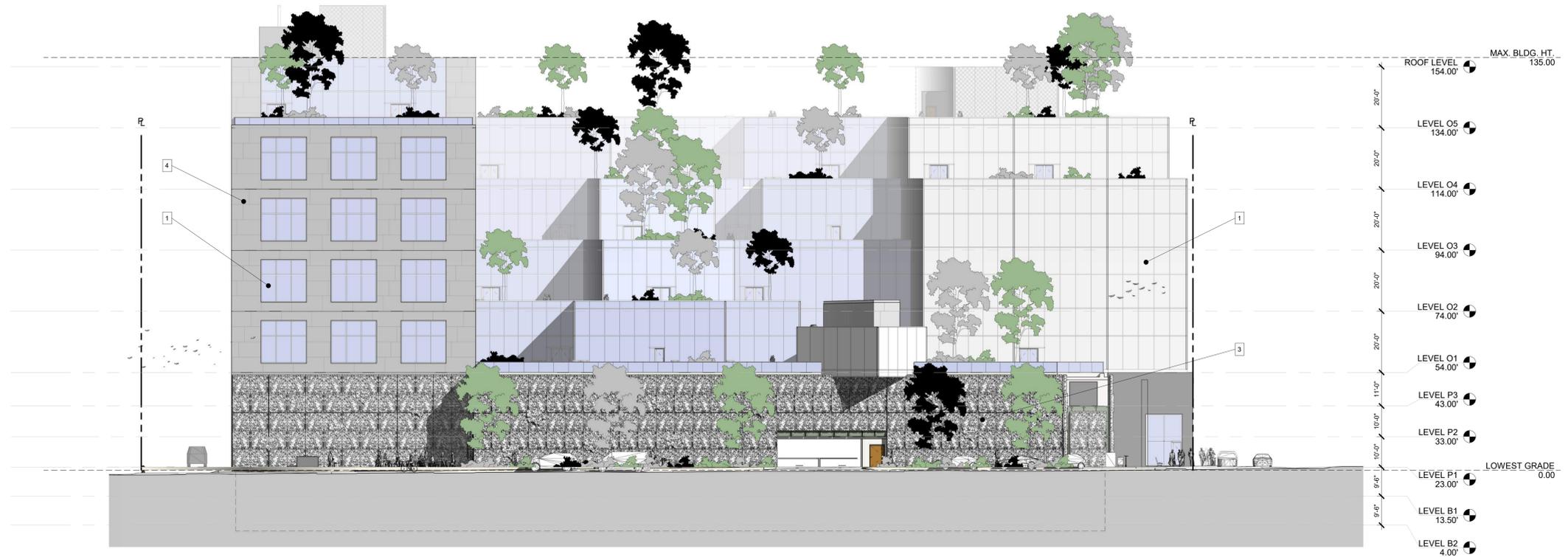
KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

ELEVATIONS - NORTH
& SOUTH

PROJECT NO.
2014-019
DATE
1/16" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

SHEET NUMBER
A3-1.1



2 WEST BUILDING ELEVATION - JANDY PLACE
1/16" = 1'-0"

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL



1 EAST BUILDING ELEVATION - PEDESTRIAN WALK
1/16" = 1'-0"

EXTERIOR FINISHES	
1	LOW-E GLASS WINDOW WALL
2	WHITE PLASTER WALL
3	GREEN WALL (PLANTED)
4	INSULATED METAL PANEL

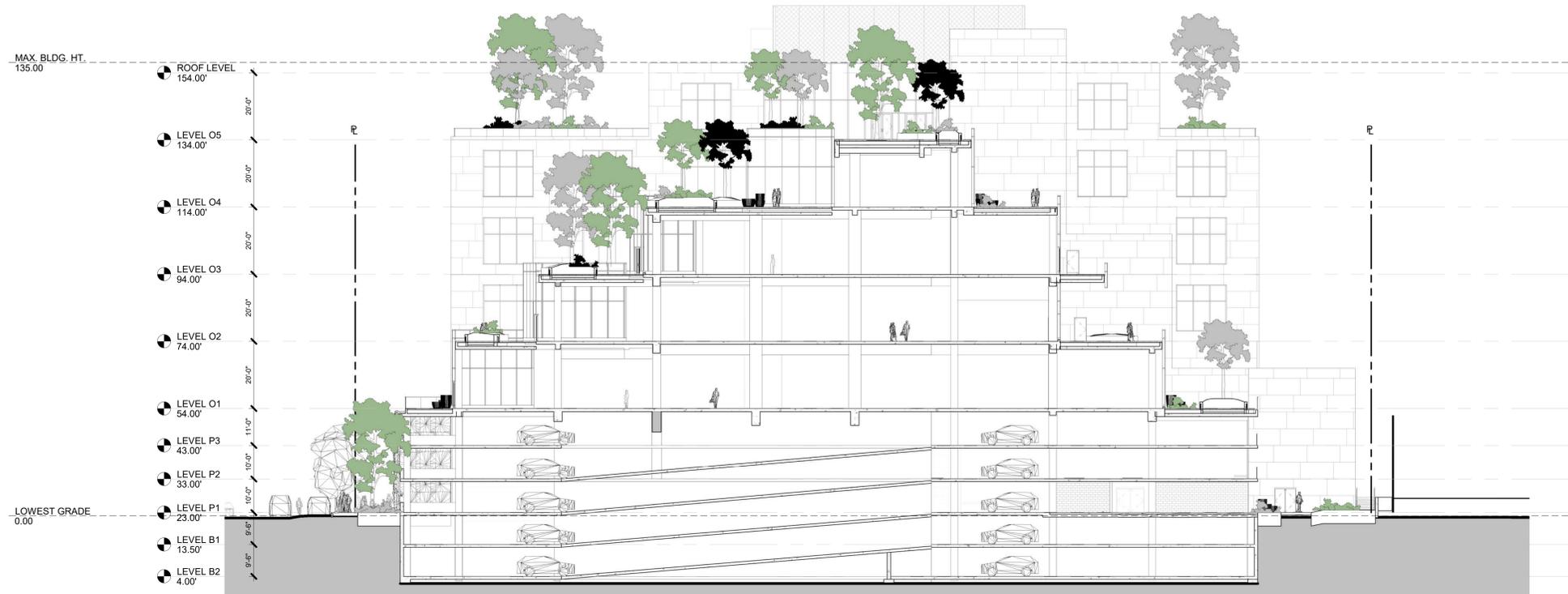
KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

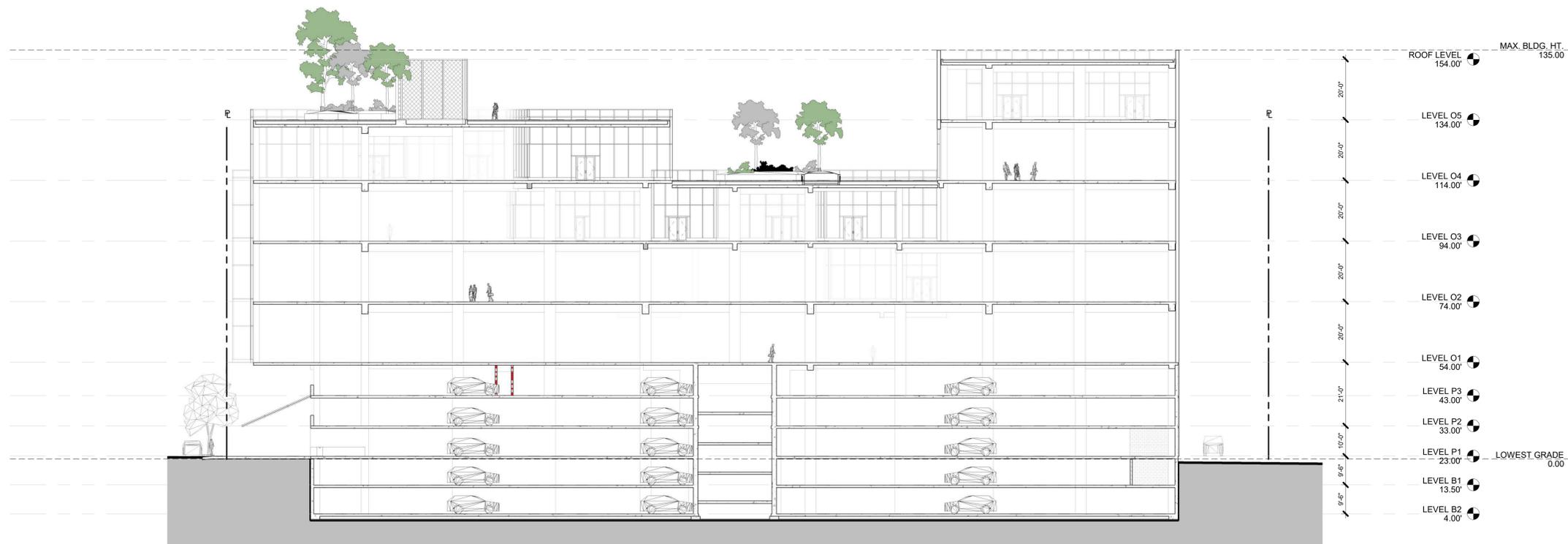
ELEVATIONS - EAST & WEST

PROJECT NO.
2014-019
DATE
1/16" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

SHEET NUMBER
A3-1.2



1 SECTION EAST/WEST
1/16" = 1'-0"



2 SECTION NORTH/SOUTH
1/16" = 1'-0"

KEY PLAN

NEW BEATRICE WEST
12575 BEATRICE STREET

TITLE

SECTIONS

PROJECT NO.
2014-019
SCALE
1/16" = 1'-0"
DRAWN BY
Author
DATE
02/18/2020

PROJECT NUMBER
A3-2.1

EXHIBIT B

CPC-2016-1208-CU-SPR LOD

ENV-2020-3533-EIR

MARCH 13, 2025



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 532, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: AUG 18 2017

Case No.: CPC-2016-1208-CU-SPR

Council District: 11 - Bonin

CEQA: ENV-2016-1209-MND

Plan Area: Palms–Mar Vista–Del Rey

Related Case: AA-2017-397-PMEX

Project Site: 12575 Beatrice Street;
12553–12575 West Beatrice Street;
5410–5454 South Jandy Place

Applicant: Kevin Mansfield, NSB Associates, Inc.
Representative: Michael Chait, Chait & Company, Inc.

At its meeting of **July 27, 2017**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

The demolition an existing 23,072-square-foot office building, accessory structures and surface parking and the construction of a 135-foot tall, office building with associated parking, landscaping, and hardscape on a project site in the M2-1 Zone. The new building includes approximately 196,100 square feet of office space located on the fourth to eighth floors; 2,500 square foot café/restaurant with outdoor seating and smaller retail spaces on the ground floor; and 900 square-feet of retail space on the second and third floors, amounting to a total building space of 199,500 square-feet. The project provides approximately 48,584 square feet of landscaped area (e.g., trees, green space, etc.) and 47,198 square-feet of hardscape area (e.g., courtyards, pathways, etc.) throughout the project site and on the new building terraces on the upper levels. The proposed project provides one and one half (1.5) levels of subterranean parking and three and one half (3.5) above ground parking levels with 845 parking spaces, plus 20 surface spaces on the east side of the 12541 Beatrice Street building, for a total of 865 spaces.

An existing, approximately 87,881 square-foot, office building located 12541 Beatrice Street will remain with new site landscape and hardscape improvements and will be incorporated into the overall project. A covered ground level walk in the middle of the building would provide east-west pedestrian circulation through the project.

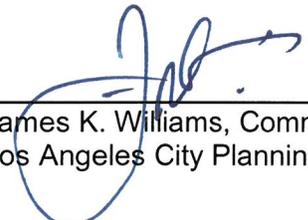
1. **Found**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2016-1209-MND (“Mitigated Negative Declaration”), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **found** the Mitigated Negative Declaration reflects the independent judgment and analysis of the City; **found** the mitigation measures have been made enforceable conditions on the project; and **adopted** the Mitigated

- Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;
2. **Approved** a Conditional Use Permit, pursuant to Section 12.24-U,14 of the Los Angeles Municipal Code (LAMC), to allow a Major Development Project involving the construction of an approximately 200,000 square-foot office building in the M2-1 Zone;
 3. **Approved** a Site Plan Review, pursuant to LAMC Section 16.05, to allow for the construction, use, and maintenance of a project involving the construction of an approximately 200,000 square-foot office building in the M2-1 Zone;
 4. **Adopted** the attached Conditions of Approval as modified by the Commission; and
 5. **Adopted** the attached Findings.

The vote proceeded as follows:

Moved: Ambroz
 Second: Choe
 Ayes: Katz, Millman, Mitchell, Padilla-Campos
 Absent: Mack, Perlman, Dake Wilson

Vote: 6 - 0



James K. Williams, Commission Executive Assistant II
 Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is appealable to the Los Angeles City Council within 15 days after the mailing date of this determination letter. Any appeal not filed within the 15-day period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE: SEP 05 2017

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Modified Conditions of Approval, Findings

c: Charlie Rausch Jr. Chief Zoning Administrator
 Nicholas Hendricks, Senior City Planner
 Jenna Monterrosa, City Planner

CONDITIONS OF APPROVAL

As modified by the City Planning Commission 7-27-17

Pursuant to Sections 12.24-U.14, and 16.05 of the Los Angeles Municipal Code, the following conditions are hereby imposed upon the use of the subject property:

1. **Site Development.** The use and development of the property shall be in substantial conformance with the plot plan marked Exhibit "A", last revised July 13, 2017, except as may be revised as a result of this action. No change to the plans will be made without prior review by the Department of City Planning, and written approval by the Director of Planning, with each change being identified and justified in writing. Minor deviations may be allowed in order to comply with provisions of the Municipal Code, the subject conditions, and the intent of the subject permit authorization.
2. **Use.** All other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies shall be strictly complied with in the development and use of the property, except as such regulations are herein specifically varied or required.
3. **Height.** The project shall be permitted a maximum building height of 135 feet (135'), with an additional 20 feet in height permitted for the housing of rooftop mechanical equipment, only.
4. **Parking.**
 - a. **Electric Vehicle Parking.** The project shall include at least 20 percent (20%) of the total provided parking spaces capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. In addition, five percent (5%) of the total provided parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the required 20 percent or five percent results in a fractional space, round up to the next whole number. A label stating "EVCAPABLE" shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point. None of the required EV Ready parking shall apply to parking spaces used for dealership vehicle storage.
 - b. In addition to the above described requirements, 20 percent (20%) of the parking spaces provided beyond the requirements of the Los Angeles Municipal Code shall be provided with EV chargers equipped to immediately accommodate electric vehicle within the parking area. When the application the required 20 percent results in a fractional space, round up to the next whole number.
5. **Above-Grade Parking.** Above-grade parking shall be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.

6. **Green Wall.** The applicant shall plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.

7. **Solar-Ready Building.**
 - a. The project shall comply with the Los Angeles Green Building Code, Section 95.05.211, to the satisfaction of the Department of Building and Safety.
 - b. A minimum of 3,300 square feet of roof area, as shown on Exhibit A, shall be reserved for the installation of a solar photovoltaic system. The system shall be installed prior to the issuance of a certificate of occupancy.

8. **Ancillary Uses.** Accessory café/restaurant and retail space shall not exceed 3,400 square feet. Per LADOT Technical Traffic Memorandum (CTC15-103799) the commercial component of this development has been reviewed and approved at a trip generation factor equivalent to that of an office campus. Any accessory commercial use identified to have a trip generation factor equivalent to a restaurant or cafeteria and service retail facilities or below (as referenced in the ITE Trip Generation Manual) is allowed. The applicant shall submit final plans to LADOT to determine if the project conforms to LADOT Case No. CTC15-103799, or if additional review and analysis is required.

9. **Landscaping.**
 - a. All planters containing trees shall have a minimum depth of 48 inches.
 - b. Two (2) Western Sycamore (*Platanus racemosa*) trees located at the southeastern corner of 12575 Beatrice Street shall be preserved and incorporated into the landscape of the proposed project.
 - c. All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.

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

11. **Pedestrian/Security Gate.** Any security gate provided on-site shall be maintained open to the public during business hours.

12. **Mechanical and Rooftop Equipment Screening.** Any structures on the roof, such as air conditioning units and other equipment, shall be fully screened from view of any abutting properties and the public right-of-way. All screening shall be setback at least five feet from the edge of the building.

13. **Trash/Storage.**
 - a. All trash collection and storage areas shall be located on-site and shall not be visible from the public right-of-way.

- b. Trash receptacles shall be stored in a fully enclosed building or structure, constructed with a solid roof, at all times.
- c. Trash/recycling containers shall be locked when not in use.

14. Vehicular Access.

- a. All requirements and conditions listed in the Department of Transportation's "Traffic Impact Assessment" and "Assessment of Supplemental Traffic Measures" letters dated, June 6, 2017, and all subsequent revisions to these this traffic assessment, shall be applied to the project. Supplemental Traffic Measures include:
 - i. Jandy Place Driveway Restrictions: In order to enhance safety for pedestrians on Jandy Place, during the 60 minute lunch time period between 12:30 p.m. and 1:30 p.m. Monday through Friday, the ingress and egress to the project from Jandy Place shall be closed, and the only available ingress and egress shall be via Beatrice Street.
 - ii. Further Study of Jandy Place Driveway Restrictions: In connection with the first annual supplemental traffic signal warrant analyses submitted pursuant to Project Requirement C.4 contained in our November 21, 2016 TIA, the project shall also submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the a.m. peak and p.m. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined in Recommendation 1 above. The analysis shall be submitted to DOT for review. If deemed warranted by DOT, the project shall implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.
 - iii. Funding for Pedestrian Crossing: The applicant shall fund and install a yellow flashing signal at the existing striped crosswalk on Inglewood Blvd. at Beatrice Street. If, at the time of project approval, this improvement has been funded by others, then DOT shall require a similar nearby measure of equivalent value designed to enhance pedestrian and student safety in the vicinity of the project.
- b. A minimum of 20-foot reservoir space is required between any ingress security gate(s) and the property line or to the satisfaction of the Department of Transportation.
- c. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk, LAMC 12.21-A-5(i)a.
- d. This project is subject to the Los Angeles Coastal Transportation Corridor Specific Plan requirement. A parking are and driveway plan shall be submitted to the Department of transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Final DOT approval should be accomplished by submitting detailed site/driveway plans at a scale of 1"=40' to DOT's West LA/Coastal Development Review Section located at 7166 W. Manchester Avenue, Los Angeles, CA 90045. For an appointment, call (213) 482-7024.

15. Pedestrian Access during Construction.

- a. Maintain Pedestrian Access. The project applicant shall implement the following:

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. The plan shall maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- Sidewalks shall remain open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as reasonably feasible taking construction and construction staging into account.

16. Construction Noise.

- a. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- b. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- c. Temporary noise barriers shall be used along the property boundaries to block the line-of-site between the construction equipment and adjacent land uses.
- d. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. On-site power generators shall either be plug-in electric or solar powered, where feasible.

17. **Construction Parking.** Parking for construction workers shall be provided on-site, where feasible, and/or in a nearby lot rented by the Project Applicant. Street parking by construction workers shall not be permitted.

18. Prior to the issuance of the building permit, a copy of an approved Case No. AA-2017-397-PMEX shall be submitted to the satisfaction of the Department of City Planning.

19. Signage. The approval of this application does not constitute approval of a signage plan or signage.

20. Modifications. Any modifications, change-of-use or increase in floor area of the property shall be cause for separate discretionary review pursuant to applicable statutory requirements.

Environmental Conditions – Project Design Features (PDF)

21. PDF-GHG-1. The proposed project will be designed to incorporate measures that will reduce energy and resource demand, including, but not limited to, solid waste recycling, reduced-flow plumbing fixtures, low-energy appliances, and drought-tolerant landscaping. The CALGreen Code specifies additional measures that may reduce energy and resource demand from the

proposed project. The proposed project would incorporate feasible measures such as reducing baseline water usage by 12 percent, use of gray water or rainwater systems for watering landscaped areas, and compliance with the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Ongoing during project construction

Action Indicating Compliance: Approval of Construction Traffic

Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

Environmental Conditions – Mitigation Measures (MM)

22. MM- AES-1. (Light). Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction

Monitoring Frequency: Pre-construction; Construction

Action Indicating Compliance: Field inspection sign-off; Compliance certification report by Project contractor

23. MM-AES-2. (Glare). The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat. Windows and other glass surfaces would have a transparency higher than 80 percent and be less than 15 percent reflective.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once, at plan check; during project construction

Action Indicating Compliance: Approval of Building Permit; Written compliance certification prior to issuance of Certificate of Occupancy

24. MM-AES-3. (Screening on Parking Garages).

- a. Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the Project Site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the Project Site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.
- b. This measure would be enforced by the Los Angeles Department of Building and Safety and the Los Angeles Department of City Planning. A plan check would be conducted to ensure compliance. A field inspection would be conducted before the issue of the Certificate of Occupancy. Compliance would be indicated by Approval of Lighting Plans prior to issuance of the applicable building permit.

Enforcement Agency: Los Angeles Department of Building and Safety and Department of City Planning

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction, Construction

Monitoring Frequency: Once, at plan check; during project construction

Action Indicating Compliance: Approval of Building Permit; Written compliance certification prior to issuance of Certificate of Occupancy

25. MM-CR-1. (Tribal Monitor). Prior to commencing any ground disturbance activities including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic Resources to be qualified to identify subsurface tribal cultural resources. The archeological monitors shall observe all ground disturbance activities on the project site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the project site, an archeological monitor shall be assigned to each location where the ground disturbance activities are occurring.

Prior to the commencement of any ground disturbance activities at the project site, the Applicant, or its successor, shall notify any California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project (Gabrielino Band of Mission Indians – Kizh Nation) that ground disturbance activities are about to commence and invite the tribes to observe the ground disturbance activities, if the tribes wish to monitor.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by the qualified archeologist, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- a. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning, Office of Historic Resources.
- b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
- c. The Applicant, or its successor, shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the Applicant, or its successor, reasonably concludes that the tribe's recommendations are reasonable and feasible.
- d. In addition to any recommendations from the applicable tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by

the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.

- e. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate any significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
- f. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by a qualified archaeologist and determined to be reasonable and appropriate.
- g. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
- h. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
- i. Notwithstanding paragraph 8 above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and shall comply with the City's AB 52 Confidentiality Protocols.

Enforcement Agency: Los Angeles Department of City Planning

Monitoring Agency: Los Angeles Department of City Planning

Monitoring Phase: During excavation

Monitoring Frequency: Once upon completion of excavation

Action Indicating Compliance: Compliance report by qualified archaeological monitor

26. MM-GEO-1. The proposed project shall follow the recommended measures outlined in the preliminary geotechnical engineering investigation to ensure proper structural support in potentially liquefiable soil. These measures may include, but are not limited to
- a. The use of Auger Cast Displacement Piles (ACDP).
 - b. Performance of an indicator test pile program prior to installation of production piles.

- c. Equipping buried utilities and drain lines with flexible or swing joints.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance: Issuance of grading permits; Field inspection sign-off; Geotechnical Engineers site visit reports as needed

27. MM-NOISE-1.

- a. The construction contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- b. The construction contractor shall ensure that all equipment is properly maintained to prevent additional noise due to worn or improperly maintained parts.
- c. The construction contractor shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment).
- d. The construction contractor shall minimize the use of equipment or methods with the greatest peak noise generation potential.
- e. The construction contractor shall use on-site power generators that shall either be plug-in electric or solar powered.
- f. The construction contractor shall locate construction staging areas away from sensitive uses.
- g. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.
- h. The construction contractor shall establish a noise disturbance coordinator. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units and sound editing studios (e.g., 740 Sound Design) within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the noise disturbance coordinator.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance: Field inspection sign-off within compliance report

28. MM-Transportation/Traffic-1. Physical improvements would be required to mitigate traffic impacts at the following intersections:

- a. *Westlawn Avenue / Jefferson Boulevard.* The recommended mitigation consists of re-striping the southbound Westlawn Avenue approach to the Jefferson Boulevard intersection. The re-striping would provide two left-turn lanes, one through lane and one right-turn lane (i.e., add a second left-turn lane). Changes to the existing traffic signal

equipment needed in conjunction with the recommended improvement would also be implemented as part of the mitigation measure.

- b. *Grosvenor Boulevard / Jefferson Boulevard.* The recommended mitigation consists of re-striping the southbound Grosvenor Boulevard approach to the Jefferson Boulevard intersection. The re-striping would provide one left-turn lane and one shared left-turn/right-turn lane (i.e., add a second left-turn lane). The proposed mitigation measure would require the removal of approximately three street parking spaces on the west side of Grosvenor Boulevard north of Jefferson Boulevard. Changes to the existing traffic signal equipment needed in conjunction with the recommended improvement would also be implemented as part of the mitigation measure.
- c. *Centinela Avenue - Campus Center Drive / Jefferson Boulevard.* The recommended mitigation consists of re-striping the southbound Centinela Avenue approach to the Jefferson Boulevard intersection. The re-striping would convert one of the existing through lanes to a right-turn lane. The resulting lane configuration on the southbound approach of Centinela Avenue would provide two left-turn lanes, one through lane, and two right-turn lanes. In addition, it is recommended that right-turn traffic signal phasing be provided for the northbound Campus Center Drive approach, including overlap with the westbound Jefferson Boulevard left-turn movement. Changes to the existing traffic signal equipment needed in conjunction with the recommended improvement would also be implemented as part of the mitigation measure.
- d. Traffic Signal Implementation - In order to insure full and appropriate redress for potential access / circulation conditions, the project shall covenant and agree to implement traffic signalization at the following locations:
 - i. Jandy Place & Beatrice Street
 - ii. Westlawn Avenue & Beatrice Street

The term of the covenant shall begin with the project's first year of 80% occupancy and shall continue for three (3) consecutive years (of minimum 80% occupancy). The project shall conduct and submit annual supplemental traffic signal warrant analyses, for each location, to DOT for review. If deemed warranted, the project shall assume full responsibility for implementing the signal(s), subject to the Shared Mitigation provision below at Paragraph D.

*Should any improvement be deemed infeasible at the time of reconciliation, the City may substitute an alternative measure of equivalent effectiveness.

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Ongoing during project construction

Action Indicating Compliance: Approval of Construction Traffic

Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

29. MM-Transportation/Traffic-2. Transportation Demand Management Plan and Monitoring (TDMP&MP).

- a. Pursuant to Section 5G of the CTCSP, and in order to insure full and appropriate redress for potential access / circulation conditions, the applicant shall submit to DOT a Transportation Demand Management (TDM) Plan designed to achieve a progressive average vehicle ridership (AVR) reduction, as determined by DOT. The measurement of actual trips and monitoring shall be conducted using an automated detection and

surveillance monitoring system. In addition to providing hourly vehicular count tabulations, the monitoring system shall also be designed in a manner that will permit direct data access to DOT staff. The installation and maintenance of the monitoring system shall be at the Project's expense. The monitoring program shall continue until such time that the Project has shown, for five consecutive years, at a minimum of 80% occupancy, achievement of the progressive AVR reduction. Should the review show that an AVR reduction has not been achieved, the project shall be subject to a penalty program, to be developed in consultation with LADOT, including an extension of the monitoring review period.

A full detailed description of the TDMP, and all subsequent MP reporting, should be prepared by a licensed Traffic Engineer and submitted to DOT for review. The TDMP should be submitted to DOT and the Department of City Planning for review and approval, prior to the issuance of any certificate of occupancy.

The TDM Plan should include a variety of measures to reduce single occupant vehicle (SOV) trips by increasing the number of walking, bicycling, carpool, vanpool, and transit trips. The project shall also comply with Section 12.26-J (Ordinance 168,700) of the Los Angeles Municipal Code which requires specific TDM and trip reduction measures. The TDM program should include, but is not limited to, the following strategies:

- Provide a dedicated shuttle service;
- Provide an internal Transportation Management Coordination Program with on-site transportation coordinator;
- Implement enhanced pedestrian connections (e.g., improve sidewalks, widen crosswalks adjacent to the project, install wayfinding signage and pedestrian level lighting, etc.);
- Design the project to ensure a bicycle, pedestrian and transit friendly environment;
- Coupled with unbundled parking, provide on-site car share amenities;
- Provide rideshare program and support for project employees and tenants;
- Allow for subsidized transit passes for eligible project employees and tenants;
- Coordinate with DOT to determine if the site would be eligible for one or more of the services to be provided by the future Mobility Hubs program (secure bike parking, bike share kiosks, and car-share parking spaces);
- Provide on-site transit routing and schedule information;
- Contribute a one-time fixed fee into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the area of the proposed project. Amount of fee to be determined in consultation with DOT and Council District 11 staff.
- Guaranteed Ride Home Program

To the extent possible, the TDM plan should also include opportunities for coordination with the area adjacent Transportation Management Organizations (TMO's) including Playa Vista and the Howard Hughes Center.

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Ongoing during project construction and operation

Action Indicating Compliance: Approval of Construction Traffic

Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction), Subsequent MP reporting submitted to the Department of Transportation

30. **MM-Transportation/Traffic-3. Construction Impacts.** DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Ongoing during project construction

Action Indicating Compliance: Approval of Construction Traffic

Management Plan from the Los Angeles Department of Transportation prior to issuance of Building Permit (Pre-construction); compliance certification report submitted by Project contractor (Construction)

Administrative Conditions of Approval

31. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
32. **Code Compliance.** Area, height and use regulations of the M2-1 zone classification of the subject property shall be complied with, except where herein conditions are more restrictive.
33. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.
34. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.
35. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
36. **Building Plans.** A copy of the first page of this grant and all Conditions and/or any subsequent appeal of this grant and its resultant Conditions and/or letters of clarification shall be printed on the building plans submitted to the Development Services Center and the Department of Building and Safety for purposes of having a building permit issued.
37. **Corrective Conditions.** The authorized use shall be conducted at all time with due regards to the character of the surrounding district, and the right is reserved to the City Planning Commission, or the Director pursuant to Section 12.27.1 of the Municipal Code to impose additional corrective conditions, if in the Commission's or Director's opinion such conditions are proven necessary for the protection of persons in the neighborhood or occupants of adjacent property.

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

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

Applicant shall do all of the following:

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

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

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

For purposes of this condition, the following definitions apply:

“City” shall be defined to include the City, its agents, officers, boards, commission, committees, employees and volunteers.

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

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

FINDINGS

General Plan/Charter Findings

1. General Plan.

- a. **General Plan Land Use Designation.** The subject property is located within Palms – Mar Vista – Del Rey Community Plan which was updated by the City Council on September 16, 1997.

The Plan Map designates the subject property for Light Manufacturing land uses. The Light Manufacturing land use designation includes the corresponding zones of MR2 and M2. The subject property is currently zoned M2-1. A General Plan Amendment and Zone Change have not been requested by the applicant.

The subject property is located in an Industrial planned area. As described in the General Plan Framework Element, it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses. The site's land use designation, however, permits the proposed creative office uses without the necessity of any legislative actions, thereby preserving industrial land within the City.

The Zone and Height District pertaining to the site is consistent with the range of zones within the Light Manufacturing use designation.

Therefore, the project is in substantial conformance with the purposes, intent and provisions of the General Plan as reflected in the adopted Framework Element and Community Plan.

- b. **Land Use Element.**

The Palms – Mar Vista – Del Rey Community Plan designates the site for Light Manufacturing use. This land use designation permits office and creative office uses, such as the proposed project. As described herein, the project is consistent with the goals and objectives of the Community Plan, inclusive of those which seek to strengthen economic areas with new commercial opportunities, those that seek to enhance aesthetics of commercial areas, and those which seek to ensure enhanced commercial and industrial development that balances the growth of employment opportunities with minimal impacts to neighboring residential uses.

The Community Plan text includes the following relevant land use objectives and policies:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving the historic, commercial, and cultural character of the community.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses should be located in existing established commercial areas or shopping centers.

Objective 2-1: To enhance the appearance of commercial districts.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force with minimal adverse impact on adjacent uses.

Objective 3-1: To provide a viable industrial base with job opportunities for residents with minimum environmental and visual impacts to the community.

Policy 3-1.1: Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities.

Policy 3-1.2: Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.

Program: State and County agencies enforce environmental protection standards and health and safety requirements.

Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.

Program: Implement design policies and standards for industrial uses.

Program: A decision maker should evaluate the traffic impacts on adjacent residential areas by uses proposed on industrially designated lands.

The project has considered the neighborhood context in the development of its design. The Project steps down in size and scale modulating in height between the two elements, with varying size floor plates accented by outdoor areas and extensive landscaping. In recognition of the nearby single-family neighborhood to the east across Grovesnor Avenue, the Project's tallest elements are oriented away from the residential area and away from the apartment complex to the south across Beatrice Street. The building design includes attractive landscaped terraces to add greenery and minimize visual impacts. Street level landscaping, pedestrian amenities, walkways, and retail uses will be added to activate the area.

The project will remove an outdated industrial building and construct a modernized commercial building that will respond to the evolving needs of a growing creative office commercial sector, while also enhancing the appearance of the area. The creative office campus will involve the new construction of a structure that has been designed to floor plates and ceiling heights varying in size by level, which may be modified to offer flexible combinations of spaces to accommodate different and diverse user

needs. While designated for Light Manufacturing uses, the project is located within a neighborhood of mixed uses, including commercial professional office; industrial warehousing, distribution and storage; light manufacturing; multi-family residential uses. The site's M2-1 Zoning designation currently results in a site that is underutilized and the project will strengthen the viability of the area.

As designed, the project has the potential to provide significant employment opportunities in office, research, and development uses. The existing uses of the area will be complemented by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

- c. The **Framework Element** for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site.

The subject property is located in an Industrial planned area. As described in the General Plan Framework Element, it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses.

The Framework Element identifies the following land use standards and typical development characteristics with regards to the Light Manufacturing Land Use designation.

- Industrial uses with potential for a low level of adverse impacts on surrounding land uses
- Increased range of commercial uses that *support* industrial uses
- Possible consideration for other uses where parcels will not support viable industrial uses

The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following goals, objectives and policies relevant to the instant request and its location within a Light Manufacturing Land Use Designation:

Industrial Land Uses:

Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.

Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.

Policy 3.14.2: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).

Policy 3.14.3: Promote the re-use of industrial corridors for small scale incubator industries.

Policy 3.15.4: Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.

The project will contribute toward and facilitate the City's long-term fiscal and economic viability by redeveloping an under-utilized site with an integrated creative office campus that will provide new job opportunities and provide amenities to neighboring uses. Therefore, the proposed project is consistent with the Industrial Land goals, objectives and policies of the General Plan Framework Element.

- d. The **Mobility Element** of the General Plan (Mobility Plan 2035) is not likely to be affected by the recommended action herein. Both Beatrice Street and Jandy Place, abutting the property to the south and west, are fully improved standard Local Streets, dedicated to widths of 60 feet and improved with asphalt roadway and concrete curb, gutter and sidewalk.

As described in the Mobility Element, collector local and other streets (such as mountain and airport roads) are depicted in the Mobility Element's circulation system maps for reference only. That being said, the project responds to the following policies within the General Plan's Mobility Element:

Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.

The project will provide an off-street loading area that is fully integrated into the project and will service both the proposed and existing buildings on site. The loading space has been designed to be more than 200 feet away from the street frontage, so as to allow for adequate back-up and queuing space, resulting in minimal impacts to the surrounding circulation system.

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

The project has been designed with ample vehicular and bicycle parking, with all requirements of the Los Angeles Code being met.

Policy 3.2: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

As previously described, the project has the potential to provide significant employment opportunities to the area. Existing uses of the area will be complemented

by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

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

Bicycle facilities have been fully incorporated into the project's design and located in secured, pedestrian accessible areas.

Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

As conditioned, a minimum of 20% of all new parking spaces will be installed as electronic vehicle-ready. In addition, 5% of the total code required amount of parking will be further provided with EV chargers to immediately accommodate electric vehicles.

Lastly, the Department of Transportation submitted a Traffic Impact Assessment of the proposed project, dated June 6, 2017, and that determined that traffic impacts from trips generated from the project will be less than significant with the incorporation of mitigation that has been conditioned herein by this action.

Therefore, the proposed project involving the approval of a Major Development Project and Site Plan Review is consistent with Mobility Plan 2035 goals, objectives and policies of the General Plan.

Conditional Use Findings

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

The project will construct a creative office building that will be added to the site of existing office uses, thereby creating an office campus like setting. The project will provide Code required parking and has the potential to provide significant employment opportunities in office, research, and development uses, which will benefit the community, city, and region. The new building has been designed to respond to the flexible needs of the growing creative office commercial sector, while also enhancing the appearance of the immediate area. The floor plans and ceiling heights have been designed to vary in size by level. As a result, floors may be modified to offer flexible combinations of spaces to accommodate a variety of different tenants.

The proposed building incorporates elements that enhance the built environment and integrate the project into the surrounding neighborhood. Significant landscaped terraces break up the massing and add greenery to the new building. An existing parking area located on the east side of the existing building will remain, and it will be improved with new plantings, hardscape, and enhanced lighting. Ground level pedestrian features provide for amenities that may be utilized by employees of the building or surrounding community members. Such features include public seating and gathering space that is enhanced with landscaping and located along Beatrice Street and Jandy Place.

As designed, the project has the potential to provide a service of significant employment opportunities in office, research, and development uses. The existing uses of the area will be complemented by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

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

The proposed project involves the demolition of an existing 23,072 square-foot office building, construction of a new 199,500 square-foot commercial office building containing accessory restaurant/café uses, retention of an existing building on site, and the addition of landscaping and hardscape improvements to the entire site. The project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. The project will enhance the surrounding area that is currently developed with a variety of commercial uses in many dated manufacturing buildings. While designated for Light Manufacturing uses, the project is located within a neighborhood of mixed uses, including commercial professional office; industrial warehousing, distribution and storage; light manufacturing; and multi-family residential uses. The site's land use designation permits the proposed creative office uses without the necessity of any legislative actions, thereby preserving the designated land use pattern of the surrounding neighborhood.

As described earlier, the project will redevelop an under-utilized site with an integrated creative office campus that will provide new job opportunities and provide amenities to neighboring uses. Existing uses of the area will be complemented by the addition of a safe, accessible, and modern facility. In addition to the provision of flexible creative office space and ample parking, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

The proposed building employs design elements, including integrated landscaped terraces that break up building massing and add a significant amount of greenery. The new building additionally incorporates ground level setbacks along the Beatrice Street and Jandy Place street frontages as well as within the development. These areas are landscaped and designed to be pedestrian-oriented to include gathering space and seating areas. While the building is taller than most of the existing buildings in the immediate area, other buildings that fit the same context include the five-story residential building abutting the project site to the south with a permitted floor area ratio of 1.97:1, and a six-story commercial building located further south with a permitted floor area ratio of 2.0:1. The project's floor area ratio is proposed at approximately 1.46:1, which is less than the allowable 1.5:1 and compatible with the surrounding M2-1 Zone neighborhood. As conditioned, the height of the new building will vary from 30 feet to approximately 125 feet tall, and has been designed to maintain a human scale at the ground floor.

Driveways on Beatrice Street and Jandy Place will provide access to parking. Truck deliveries would be routed along Jandy Place to the building's northeast corner. In response to concerns from neighboring uses of the immediate area, the project was modified to reduce its height and reconfigure its driveway circulation plan to reduce impacts on surrounding uses. Three existing driveways serving the site of the proposed building along Beatrice Street will be replaced with two driveways serving the parking levels of the new structure. Two additional driveways along Jandy Place will be added to additionally serve

the parking levels of the proposed building. In addition, an existing driveway located at the north end of the Jandy Place cul-de-sac will be modified to allow for access to a new loading and trash collection area that is located on-site and out of the public right-of-way. This driveway additionally serves as a buffer between the northerly adjoining commercial property and the project site. The proposed driveway plan has been designed to ensure that the vehicles are able to easily access on-site parking and to ensure that vehicular traffic does not disproportionately affect one street frontage over the other.

Pedestrian access to the proposed project would be along Beatrice Street, Jandy Place, and from the new courtyard on the eastside of the building which will serve to fully integrate the new building into the existing neighborhood. Significant open space, which includes public seating areas along all street frontages, has been designed for use by potential employees and surrounding building and community residents.

The project components which include its location, size, height, operations and other significant features have been appropriately designed so as to ensure that these elements of the project are compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

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

The Palms – Mar Vista – Del Rey Community Plan designates the site for Light Manufacturing use. This land use designation permits office and creative office uses, such as the proposed project. As described herein, the project is consistent with the goals and objectives of the Community Plan, inclusive of those which seek to strengthen economic areas with new commercial opportunities, those that seek to enhance aesthetics of commercial areas, and those which seek to ensure enhanced commercial and industrial development that balances the growth of employment opportunities with minimal impacts to neighboring residential uses.

The Community Plan text includes the following relevant land use objectives and policies:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving the historic, commercial, and cultural character of the community.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses should be located in existing established commercial areas or shopping centers.

Objective 2-1: To enhance the appearance of commercial districts.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force with minimal adverse impact on adjacent uses.

Objective 3-1: To provide a viable industrial base with job opportunities for residents with minimum environmental and visual impacts to the community.

Policy 3-1.1: Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities.

Policy 3-1.2: Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.

Program: State and County agencies enforce environmental protection standards and health and safety requirements.

Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.

Program: Implement design policies and standards for industrial uses.

Program: A decision maker should evaluate the traffic impacts on adjacent residential areas by uses proposed on industrially designated lands.

The project will remove an outdated industrial building and construct a modernized commercial building that will respond to the evolving needs of a growing creative office commercial sector, while also enhancing the appearance of the area. The creative office campus has will involve the new construction of a structure that has been designed with floor plates and ceiling heights varying in size by level, which may be modified to offer flexible combinations of spaces to accommodate different and diverse user needs. While designated for Light Manufacturing uses, the project is located within a neighborhood of mixed uses, including commercial professional office; industrial warehousing, distribution and storage; light manufacturing; and multi-family residential uses. The site's M2-1 Zoning designation currently results in a site that is underutilized and the project will strengthen the viability of the area.

As designed, the project has the potential to provide significant employment opportunities in office, research, and development uses. The existing uses of the area will be complemented by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage/retail amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

Ground level setbacks at the street frontages and within the development are landscaped and pedestrian-oriented, which will enhance the appearance of the surrounding area. A seating, gathering area and restrooms are envisioned in a setback area near the cul-de-sac end of Jandy Place. Additional seating areas are located along Beatrice Street, including café seating. Building access, access to bicycle storage, repair, lockers showers and restrooms are also provided. A new pedestrian court is located between 12575 and 12541 Beatrice Street. It contains approximately 13,000 SF of open space with access from Beatrice Street and the covered walkway in 12541 Beatrice Street; and features include seating, planting and hardscape. The existing parking areas on the east side of 12541 Beatrice Street, including the parking area at 5415 Grosvenor Boulevard are re-designed to include new planting, hardscape, pavement markings, and update lighting.

Supplemental Major Development Project Findings

- 4. The project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood.**

The project site consists of four (4) contiguous lots at 12575 and 12541 Beatrice Street in the Palms – Mar Vista – Del Rey Community Plan area. The proposed project involves the demolition of an existing 23,072 square-foot office building, construction of a new 199,500 square-foot building creative office building, retention of an existing 87,881 square-foot building on site, and the installation of landscaping and hardscape improvements on the entire site.

Adjacent and neighboring properties are fully developed with a mix of commercial, light industrial, and multi-family residential uses. To ensure that the project is compatible with the surrounding neighborhood, the project has been designed with ground level setbacks along the Beatrice Street and Jandy Place street frontages and within the development. These areas are landscaped, pedestrian oriented, and provide passive seating areas for the public. Ground floor café/retail uses will add to available amenities in the surrounding neighborhood. In addition, a partially covered pedestrian paseo was been designed between the proposed and existing buildings, with access provided at the intersection of Beatrice Street and Westlawn Avenue. Building access, access to bike storage, and shower, locker and restrooms are provided along Beatrice Street. Outdoor seating areas for eating and gathering are provided along both Beatrice Street and Jandy Place.

The project concentrates its floor area to a single multi-story building, rather than distributing allowable floor area over the entire development site. In doing so, the project reduces impacts to the predominately residential street face on the south side of Beatrice Street and allows for increased open space and landscaping. The building's mass is varied to enhance its pedestrian scale from the street. Landscaped terraces are open to the adjoining streets and pedestrian court.

Driveways on Beatrice Street and Jandy Place will provide access to parking. Truck deliveries would be routed along Jandy Place to the building's northeast corner. In response to concerns from neighboring uses of the immediate area, the project was modified to reduce its height and reconfigure its driveway circulation plan to reduce impacts on surrounding uses. Three existing driveways serving the site of the proposed building along Beatrice Street will be replaced with two driveways serving the parking levels of the new structure. Two additional driveways along Jandy Place will be added to additionally serve the parking levels of the proposed building. In addition, an existing driveway located at the north end of the Jandy Place cul-de-sac will be modified to allow for access to a new loading and trash collection area that is located on-site and out of the public right-of-way. The proposed driveway plan has been designed to ensure that the vehicles are able to easily access on-site parking and to ensure that vehicular traffic does not disproportionately affect one street frontage over the other.

The project will provide an off-street loading area that is fully integrated into the project and will service both the proposed and existing buildings on site. The loading space has been designed to be more than 200 feet away from the street frontage, to allow for adequate back-up and queuing space, resulting in minimal impacts to the surrounding circulation system. This driveway additionally serves as a buffer between the northerly adjoining commercial property and the project site.

As such, the project provides for an arrangement of uses, buildings, structures, open spaces and other improvements that are compatible with the scale and character of the adjacent properties and surrounding neighborhood

5. The project complies with the height and area regulations of the zone in which it is located.

The M2-1 zoning of the project site permits a by-right floor area ratio of 1.5:1. For a project site totaling 196,447 square feet, this ratio permits a total floor area of 294,671 square feet. The project's proposed floor area totaling 269,277 square feet, (69,777 square feet for the existing building and 199,500 square feet for the proposed new building. The proposed floor area ratio is approximately 1.46:1, which is less than the allowable 1.5:1 ratio permitted by the M2-1 Zone. As conditioned, the height of the proposed new building varies from 30 feet to 125 feet in height, with an additional maximum 20-foot tall rooftop penthouse intended for the housing of mechanical equipment only. While the site's zoning does not limit the height of the proposed project, the site located within an Airport Hazard area, which is an area designated as an airport hazard area whose boundaries impose height limitations on the use of the land. Airport Hazard means any structure or tree or use of land which obstructs the airspace required for the flight of aircraft in landing or taking off at an airport or is otherwise hazardous to the landing or taking off of an aircraft. Specifically, the applicable Airport Hazard limits the height of the subject site to 200 feet. The proposed project is consistent with this limitation.

6. The project is consistent with the City Planning Commission's design guidelines for Major Development Projects, if any.

The Los Angeles City Planning Commission has not adopted a specific set of design guidelines for Major Development Projects. The project does, however, meet the intent of Citywide Design Guidelines for commercial and industrial uses, where applicable.

Commercial Citywide Design Guidelines:

Objective 1: Consider neighborhood context and linkages in building and site design.

1. Activate street frontages with a courtyard or "outdoor room" adjacent to the street by incorporating pedestrian amenities such as plazas with seating or water features.
2. Provide direct path of travel for pedestrian destinations within large developments.
3. Incorporate passageways or paseos into mid-block developments that facilitate pedestrian and bicycle access to commercial amenities.
4. Promote pedestrian activity by placing entrances at grade level and unobstructed from view from the public right-of-way. Avoid sunken entryways below street level. Where stairs are located near the main entrance, highly visible and attractive stairs should be placed in a common area such as an atrium or lobby and integrated with the predominant architectural design elements of the main building.
5. Ground floor retail establishments should maintain at least one street-facing entrance with doors unlocked during regular business hours to maintain an active street presence.

The project will upgrade an outdated industrial building with a new modern building, integrated into the site and existing building. The project has considered the neighborhood context in the development of its design. The Project steps down in size and scale modulating in height between the two elements, with varying size floor plates accented by outdoor areas and extensive landscaping. In recognition of the nearby single-family neighborhood to the

east across Grovesnor Avenue, the Project's tallest elements are oriented away from the residential area and away from the apartment complex to the south across Beatrice Street. The building design includes attractive landscaped terraces to add greenery and minimize visual impacts. Street level landscaping, pedestrian amenities, walkways, and retail uses will be added to activate the area.

Objective 2: Employ high quality architecture to define the character of commercial districts.

1. Maintain a human scale rather than a monolithic or monumental scale.
2. Differentiate the ground floor from upper floors. Changes in massing and architectural relief add visual interest and help to diminish the perceived height of buildings.
3. Vary and articulate the building façade to add scale and avoid large monotonous walls.
4. Treat all facades of the building with an equal level of detail, articulation, and architectural rigor.
5. Integrate varied roof lines through the use of sloping roofs, modulated building heights, stepbacks, or innovative architectural solutions.
6. Utilize landscaping to add texture and visual interest at the street level.

The architecture of the building is contemporary and includes a combination of window openings in solid walls and glass curtain walls. Multiple wall planes articulate the building façade. The mass of the building is broken-up by a series of landscaped terraces. The ground floor level is activated by proposed café/retail uses that are accessible from the grade and designed with ample outdoor seating. At the upper portion of the building, the landscaped terraces buffer the rising separate floors.

Objective 4: Minimize the appearance of driveways and parking areas.

1. Wrap parking structures with active uses such as retail spaces or housing units on the ground floor.

Objective 5: Include open space to create opportunities for public gathering.

1. Retain mature and healthy vegetation and trees when developing a site, especially native species.
2. Design landscaping to be architecturally integrated with the building and suitable to the functions of the space.
3. Design open areas to maintain a balance of landscaping and paved area.

The building street frontages are close to the existing sidewalks while providing street level setbacks for landscaping and pedestrian amenities. The site plan for the development ties previously disconnected lots together using landscape and hardscape features that provide a combined total of over 90,000 square feet of space. The project has been conditioned to preserve existing Western Sycamore trees and incorporate them into the proposed pedestrian paseo located near the intersection of Beatrice Street and Westlawn Avenue.

Industrial Citywide Design Guidelines:

Objective 1: Consider neighborhood context and compatible design of uses.

1. Provide direct paths of travel for pedestrian destinations within large developments.

2. Provide bicycle lockers and/or racks near building entrances. Disperse bicycle parking facilities throughout larger sites and locate them in convenient and visible areas in close proximity to primary building entrances.

Maintaining a human scale, providing pedestrian amenities, and utilizing landscaping areas to add visual interest are common design points found in both commercial and industrial guidelines. As described above, the site plan for the development considers the neighborhood context and ties previously disconnected lots together using landscape and hardscape features that create a unified creative office campus. The provision of pedestrian amenities such as seating areas, cafes and a small retail establishment allow for the project to be better integrated with the surrounding area. Such features serve to activate not only the street, but the local vicinity, and has the potential to spark further renovations of the area and create linkages that never otherwise existed.

Site Plan Review Findings

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

There are eleven elements of the General Plan. Each of these Elements establishes policies that provide for the regulatory environment in managing the City and for addressing environmental concerns and problems. The majority of the policies derived from these Elements are in the form of Code Requirements of the Los Angeles Municipal Code. The project does not propose to deviate from any of the requirements of the Los Angeles Municipal Code.

The subject property is located within Palms – Mar Vista – Del Rey Community Plan which was updated by the City Council on September 16, 1997. The Plan Map designates the subject property for Light Manufacturing land uses. The Light Manufacturing land use designation includes the corresponding zones of MR2 and M2. The subject property is currently zoned M2-1. A General Plan Amendment and Zone Change have not been requested by the applicant.

The subject property is located in an Industrial planned area. As described in the General Plan Framework Element, it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses. The site's land use designation, however, permits the proposed creative office uses without the necessity of any legislative actions, thereby preserving industrial land within the City.

Community Plan:

The Palms – Mar Vista – Del Rey Community Plan designates the site for Light Manufacturing use. This land use designation permits office and creative office uses, such as the proposed project. As described herein, the project is consistent with the goals and objectives of the Community Plan, inclusive of those which seek to strengthen economic areas with new

commercial opportunities, those that seek to enhance aesthetics of commercial areas, and those which seek to ensure enhanced commercial and industrial development that balances the growth of employment opportunities with minimal impacts to neighboring residential uses.

The Community Plan text includes the following relevant land use objectives and policies:

Goal 2: A strong and competitive commercial sector which promotes economic vitality, serves the needs of the community through well designed, safe and accessible areas while preserving the historic, commercial, and cultural character of the community.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services within existing commercial areas.

Policy 2-1.1: New commercial uses should be located in existing established commercial areas or shopping centers.

Objective 2-1: To enhance the appearance of commercial districts.

Goal 3: Sufficient land for a variety of industrial uses with maximum employment opportunities which are environmentally sensitive, safe for the work force with minimal adverse impact on adjacent uses.

Objective 3-1: To provide a viable industrial base with job opportunities for residents with minimum environmental and visual impacts to the community.

Policy 3-1.1: Designate and preserve lands for the continuation of existing industry and development of new industrial parks, research and development uses, light manufacturing and similar uses which provide employment opportunities.

Policy 3-1.2: Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.

Program: State and County agencies enforce environmental protection standards and health and safety requirements.

Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.

Program: Implement design policies and standards for industrial uses.

Program: A decision maker should evaluate the traffic impacts on adjacent residential areas by uses proposed on industrially designated lands.

The project will remove an outdated industrial building and construct a modernized commercial building that will respond to the evolving needs of a growing creative office commercial sector, while also enhancing the appearance of the area. The creative office campus has will involve the new construction of a structure that has been designed to floor plates and ceiling heights varying in size by level, which may be modified to offer flexible combinations of spaces to accommodate different and diverse user needs. While designated

for Light Manufacturing uses, the project is located within a neighborhood of mixed uses, including commercial professional office; industrial warehousing, distribution and storage; light manufacturing; multi-family residential uses. The site's M2-1 Zoning designation currently results in a site that is underutilized and the project will strengthen the viability of the area.

As designed, the project has the potential to provide significant employment opportunities in office, research, and development uses. The existing uses of the area will be complemented by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

Framework Element:

The Framework Element for the General Plan (Framework Element) was adopted by the City of Los Angeles in December 1996 and re-adopted in August 2001. The Framework Element provides guidance regarding policy issues for the entire City of Los Angeles, including the project site.

The subject property is in an Industrial planned area. As described in the General Plan Framework Element, it is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses.

The Framework Element identifies the following land use standards and typical development characteristics with regards to the Light Manufacturing Land Use designation.

- Industrial uses with potential for a low level of adverse impacts on surrounding land uses
- Increased range of commercial uses that *support* industrial uses
- Possible consideration for other uses where parcels will not support viable industrial uses

The Framework Element also sets forth a Citywide comprehensive long-range growth strategy and defines Citywide policies regarding such issues as land use, housing, urban form, neighborhood design, open space, economic development, transportation, infrastructure, and public services. The Framework Element includes the following goals, objectives and policies relevant to the instant request and its location within a Light Manufacturing Land Use Designation:

Industrial Land Uses:

Goal 3J: Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.

Objective 3.14: Provide land and supporting services for the retention of existing and attraction of new industries.

Policy 3.14.2: Provide flexible zoning to facilitate the clustering of industries and supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).

Policy 3.14.3: Promote the re-use of industrial corridors for small scale incubator industries.

Policy 3.15.4: Limit the introduction of new commercial and other non-industrial uses in existing commercial manufacturing zones to uses which support the primary industrial function of the location in which they are located.

The project will contribute toward and facilitate the City's long-term fiscal and economic viability by redeveloping an under-utilized site with an integrated creative office campus that will provide new job opportunities and provide amenities to neighboring uses. Therefore, the proposed project is consistent with the Industrial Land goals, objectives and policies of the General Plan Framework Element.

Mobility Element:

The Mobility Element of the General Plan (Mobility Plan 2035) is not likely to be affected by the recommended action herein. Both Beatrice Street and Jandy Place, abutting the property to the south and west, are fully improved standard Local Streets, dedicated to widths of 60 feet and improved with asphalt roadway and concrete curb, gutter and sidewalk.

As described in the Mobility Element, collector local and other streets (such as mountain and airport roads) are depicted in the Mobility Element's circulation system maps for reference only. That being said, the project responds to the following policies within the General Plan's Mobility Element:

Policy 2.10: Facilitate the provision of adequate on and off-street loading areas.

The project will provide an off-street loading area that is fully integrated into the project and will service both the proposed and existing buildings on site. The loading space has been designed to be more than 200 feet away from the street frontage, so as to allow for adequate back-up and queuing space, resulting in minimal impacts to the surrounding circulation system.

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

The project has been designed with ample vehicular and bicycle parking, with all requirements of the Los Angeles Code being met.

Policy 3.2: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

As previously described, the project has the potential to provide significant employment opportunities to the area. Existing uses of the area will be complemented

by the addition of the modern facility. In addition to the provision of flexible creative office space, the project has been designed to provide accessory food and beverage amenities intended to serve the needs of potential building inhabitants as well as those existing needs of surrounding business and residential uses.

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

Bicycle facilities have been fully incorporated into the project's design and located in secured, pedestrian accessible areas.

Policy 5.4: Continue to encourage the adoption of low and zero emission fuel sources, new mobility technologies, and supporting infrastructure.

As conditioned, a minimum of 20% of all new parking spaces will be installed as electronic vehicle-ready. In addition, 5% of the total code required amount of parking will be further provided with EV chargers to immediately accommodate electric vehicles.

Lastly, the Department of Transportation submitted a Traffic Impact Assessment of the proposed project, dated June 6, 2017, and that determined that traffic impacts from trips generated from the project will be less than significant with the incorporation of mitigation that has been conditioned herein by this action.

Therefore, the proposed project involving the approval of a Major Development Project and Site Plan Review is consistent with Mobility Plan 2035 goals, objectives and policies of the General Plan.

Therefore, the project is in substantial conformance with the purpose, intent and provisions of the General Plan and Community Plan.

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

The arrangement of the proposed development is consistent and compatible with existing and future development in neighboring properties. The subject site is located within the Palms – Mar Vista – Del Rey Community Plan Area, in a neighborhood planned for Light Manufacturing uses, located in an area containing various commercial, light manufacturing, warehouse, and residential uses, and located 800 feet north of Play Vista residential development. The project site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. A five-story apartment building is located on the southwestern side of the project site, across Beatrice Street. Additionally, there are several commercial office and industrial buildings located to the west, north, and southeast of the project site. Adjacent to the eastern side of the project site are two-story (2-story) commercial office/industrial buildings. Further east are single-family homes across Grosvenor Boulevard, filling the area from Hammock Street to Beatrice Street. A five-level parking structure is located adjacent to the project site's northeastern side.

The project concentrates its floor area to a single multi-story building, rather than distributing allowable floor area over the entire development site. In doing so, the project avoids any physical impacts to the predominately residential area on the east side of Grosvenor

Boulevard. The arrangement also allows the existing office building and surface parking areas to remain and allows ample open space and landscape areas to be provided.

Height, Bulk and Setbacks

The M2-1 zoning of the project site permits a by-right floor area ratio of 1.5:1. For a project site totaling 196,447 square feet, this ratio permits a total floor area of 294,671 square feet. The project's proposed floor area totaling 269,277 square feet, (69,777 square feet for the existing building and 199,500 square feet for the proposed new building. The proposed floor area ratio is approximately 1.46:1, which is less than the allowable 1.5:1 ratio permitted by the M2-1 Zone. As conditioned, the height of the proposed new building varies from 30 feet to 125 feet in height, with an additional maximum 20-foot tall rooftop penthouse intended for the housing of mechanical equipment only. While the site's zoning does not limit the height of the proposed project, the site located within an Airport Hazard area, which is an area designated as an airport hazard area whose boundaries impose height limitations on the use of the land. Airport Hazard means any structure or tree or use of land which obstructs the airspace required for the flight of aircraft in landing or taking off at an airport or is otherwise hazardous to the landing or taking off of an aircraft. Specifically, the applicable Airport Hazard limits the height of the subject site to 200 feet. The proposed project is consistent with this limitation. Surrounding properties in the vicinity that are zoned M2-1 have the same development potential of the proposed project and, if sought, would be permitted the construction of building with a floor area ratio of 1.5:1 and a height limitation only required pursuant to the Airport Hazard limits.

With respect to surrounding uses, the project steps down in size and scale, modulating in height between the two elements, with varying size floor plates accented by outdoor areas and extensive landscaping. In recognition of the nearby single-family and multi-family uses, the Project's tallest elements are oriented away from the east and south. As such, the Project's height and scale are in keeping with the neighborhood context, and consistent with the nearby varied creative office, commercial and residential buildings.

In addition, the existing low-scale building located at 12541 Beatrice Street and be incorporated into the project. While the applicant had the ability to redevelop the existing building, the Applicant voluntarily chose to maintain the low scale element on the Property to provide a mix of building scales with a single campus in keeping with the neighboring properties.

The proposed project, located along a corridor designated for Light Manufacturing uses and developed with a combination of light manufacturing, office, and residential uses, will be compatible with existing and future development within the same zone and height district.

The site's zoning does not require the provision of any setbacks, provided that the site is developed with commercial or industrial uses. The project will, however, provide setbacks along Beatrice Street and Jandy Place that range from 0 to 20 feet, to provide for a pedestrian friendly environment, equipped with landscaping and seating areas. As described above, the driveway entrance that is provided for loading and trash collection, simultaneously provides a setback that buffers the proposed building from the northerly adjoining use.

Therefore, the height, bulk and setbacks of the mixed-use building will be compatible with the existing and future developments in the neighborhood.

Off-Street Parking Facilities

The project is required a minimum of 586 automobile parking spaces, but has been designed to provide a total of 845 parking spaces. The project is also required a minimum of 60 bicycle parking spaces, including 40 long-term and 20 short-term spaces. All automobile and long-term bike parking would be located on-site, out of the public right-of-way.

Driveways on Beatrice Street and Jandy Place will provide access to parking. Truck deliveries would be routed along Jandy Place to the building's northeast corner. In response to concerns from neighboring uses of the immediate area, the project was modified to reduce its height and reconfigure its driveway circulation plan to reduce impacts on surrounding uses. Three existing driveways serving the site of the proposed building along Beatrice Street will be replaced with two driveways serving the parking levels of the new structure. Two additional driveways along Jandy Place will be added to additionally serve the parking levels of the proposed building. In addition, an existing driveway located at the north end of the Jandy Place cul-de-sac will be modified to allow for access to a new loading and trash collection area that is located on-site and out of the public right-of-way. The proposed driveway plan has been designed to ensure that the vehicles are able to easily access on-site parking and to ensure that vehicular traffic does not disproportionately affect one street frontage over the other.

With respect to parking, the project has been conditioned to limit the number of parking levels to 2.5, rather than the 3.5 that it proposes. In consideration of comments received during review of the project's design and from business and residential neighbors of the project site, in addition to the City Planning Commission's active policy pertaining to above-grade parking structures, the project has been conditioned to screen parking and provide a green wall. In further response to the project's surplus parking provided in excess of the Los Angeles Municipal Code, staff has recommended that one level of above grade parking be removed from the project. The removal of parking located on level L4 will result in a reduction of 177 parking spaces, resulting in overall parking count of 668 spaces, which is 82 more parking spaces than required by Code. This reduction in parking will service to reduce the size of the project's parking podium, resulting in a further integration of the parking podium into the building. By removing parking located on level L4, there is an opportunity for the remaining 400 square feet of general retail space on this level to be shifted to L3, making the ancillary commercial uses more accessible to the public. As a further result, the removal of one level of parking will reduce the overall size of the project, which has been a consistent request heard from public comments.

Therefore, the off-street parking facilities will be compatible with the existing and future developments in the neighborhood.

Loading Areas

The project will provide an off-street loading area that is fully integrated into the project and will service both the proposed and existing buildings on site. The loading space has been designed to be more than 200 feet away from the street frontage, to allow for adequate back-up and queuing space, resulting in minimal impacts to the surrounding circulation system. This driveway additionally serves as a buffer between the northerly adjoining commercial property and the project site. Therefore, the loading area will be compatible with the existing and future developments in the neighborhood.

Lighting

Outdoor lighting for the proposed project has been conditioned to be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. Therefore, the lighting will be compatible with the existing and future developments in the neighborhood.

On-Site Landscaping

The proposed project will provide ample on-site landscaping that create a project that is compatible and complementary to existing surrounding uses. A total of approximately 48,584 square feet of landscaping and 47,198 square feet of hardscape is proposed with the project. Landscaping would be provided throughout the site, within the terraced levels of three (3) through eight (8), and additional landscaping provided on the roof. In addition to the landscaping that will be provided in conjunction with the new creative office building, the project will install two (2) new pedestrian walkways. One walkway will be located between the new and existing building, with pedestrian access provided at the intersection of Beatrice Street and Westlawn Avenue. A second walkway will be located on the east end of the project site, fronting on Beatrice Street. In order to ensure that the maximum number of trees is maintained on-site, the project has been conditioned to require the preserve two existing Sycamore trees located within the subject site, facing Beatrice Street. Furthermore, the project has been conditioned to require the replacement of any existing significant, non-protected trees on-site. Where new trees are proposed, the project has been conditioned to require that all planters containing trees to have a minimum depth of 48 inches to ensure adequate room for root growth and healthy trees. Finally, the project will provide street trees as required by the Urban Forestry Division, Board of Public Works.

Therefore, the on-site landscaping will be compatible with the existing and future developments in the neighborhood.

Trash Collection

The project will include on-site trash collection for both refuse and recyclable materials, in conformance with the L.A.M.C. The trash collection and pick-up will be located at the ground parking level, adjacent to the proposed loading area. The centralized trash location has been designed more than 200 feet away from the street frontage, so as to allow for adequate back-up and queuing space, resulting in minimal impacts to the surrounding circulation system.

The project has been conditioned to ensure that trash and recycling facilities will not visible from the public right-of-way. Compliance with this condition will result in a project that is compatible with existing and future development.

The Project design incorporates two creative office elements built over a fully screened and landscaped parking garage. The Project steps down in size and scale modulating in height between the two elements, with varying size floor plates accented by outdoor areas and extensive landscaping. In recognition of the nearby single-family neighborhood to the east across Grovesnor Avenue and the recently constructed multi-family structure located south of Beatrice Street, the Project's tallest elements are oriented away from these areas. As such, the Project's height and scale are in keeping with the neighborhood context, and consistent with the varied creative office, commercial and residential buildings in the area. Therefore, the arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such

pertinent improvements that will be compatible with existing and future development on neighboring properties.

9. **That any residential project provides recreational and service amenities in order to improve habitability for the residents and minimize impacts on neighboring properties.**

The proposed project is an entirely commercial use. The project is not a residential project and will not create a demand for recreation and service amenities on neighboring properties.

Additional Mandatory Findings

1. **Flood Insurance.** The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located outside of an identified Flood Zone.
2. **Environmental Findings.** On April 27, 2017, a Mitigated Negative Declaration (ENV-2016-1209-MND) was prepared for the proposed project.

On April 18, 2017, a letter was received from the Gabrieleno Band of Mission Indians – Kizh Nation, which stated and provided documentation to support that the project site is located within their ancestral tribal territory and within a known highly sacred area of Sa'angna. The letter requested that a certified Native American monitor be present on-site during all ground disturbances and mitigation measures were provided. Pursuant to Section 15073.5 of the Guidelines for California Environmental Quality Act, these mitigation measures have been conditioned and recirculation of the Mitigated Negative Declaration is not required. The revised mitigation measures provide more clarity and specifications on tribal monitoring, which will result in a more effective mitigation of impacts.

During the comment period, one letter was received from the offices of Luna & Glushon, on behalf of Karney Management Company, the owners and operators of the parcels located immediately to the west and south of the project site. The submitted letter addresses the traffic/transportation, aesthetics, and land use and planning sections of the completed Mitigated Negative Declaration and concludes that an Environmental Impact Report should be prepared for the project. The following includes a summary of the submitted letter and a response:

Comment 1-1:

The MND fails to integrate its analysis with all of the planning and environmental review procedures required under the Los Angeles Municipal Code. It provides that the certain aspects of the Project, including a haul route, off-site improvements in the adjacent rights-of-way, and "additional actions as may be determined necessary" will be evaluated at a later date.

Response:

The IS/MND's project description appropriately lists out the entitlement approvals that the project will require in order to move forward with securing building permits for demolition and construction. Contrary to the comment, the IS/MND does discuss the anticipated haul route in multiple locations throughout the IS/MND. The report additionally includes a detailed construction traffic analysis and concludes that the construction traffic associated with the proposed Project would not result in any significant traffic impacts at the study intersections.

Comment 1-2:

The MND fails to provide an environmental setting discussion. An accurate description of the physical environmental conditions in the vicinity of the project is critical for a proper evaluation of the potential environmental effects of a proposed activity.

Response:

Contrary to the comment, the IS/MND includes a detailed description of the Project Site in Section 2.0 Project Description of the IS/MND. For instance, the Project Description states the Project Site is located within the Palms—Mar Vista—Del Rey CPA of the City of Los Angeles. It includes a figure depicting that the Project Site is roughly bound by the State Route 90 (SR 90), Marina Freeway, to the north (approximately 600 feet from the Project Site) and Jefferson Boulevard to the south. It further states the Project Site is within the Del Rey neighborhood and is currently comprised of five (5) contiguous lots located at 12575 Beatrice Street and 12541 Beatrice Street. It continues that following a lot line adjustment, the Project Site will be comprised of four (4) contiguous lots totaling approximately 196,447 square feet (SF). The Project Description further states the Project Site is currently developed with a 23,072-square-foot office building and two accessory buildings of 5,044 and 2,144 SF at 12575 Beatrice Street, and an 87,881-square-foot office building at 12541 Beatrice Street.

The IS/MND includes a detailed description of the Project Site in Section 2.0 Project Description of the IS/MND. For instance, the Project Description states the Project Site is located within the Palms—Mar Vista—Del Rey CPA of the City of Los Angeles. It includes a figure (Figure 2-1) depicting that the Project Site is roughly bound by the State Route 90 (SR 90), Marina Freeway, to the north (approximately 600 feet from the Project Site) and Jefferson Boulevard to the south. It further states the Project Site is within the Del Rey neighborhood and is currently comprised of five (5) contiguous lots located at 12575 Beatrice Street and 12541 Beatrice Street. It continues that following a lot line adjustment, the Project Site will be comprised of four (4) contiguous lots totaling approximately 196,447 square feet (SF). The Project Description further states the Project Site is currently developed with a 23,072-square-foot office building and two accessory buildings of 5,044 and 2,144 SF at 12575 Beatrice Street, and an 87,881-square-foot office building at 12541 Beatrice Street.

In addition, each of the CEQA Environmental Checklist topics addressed in the IS/MND includes a discussion of the environmental setting as it pertains to that particular issue area.

Comment 1-3:

The proposed Project will degrade the existing visual character or quality of the Project site and its surroundings. It will introduce a height otherwise unknown in this area, overshadowing adjacent uses. Even worse, the MND attempts to mask the full height of the Project by claiming the Project maximum height is 135 feet, when there is actually a 20 foot high and large mechanical room on top of the 135 foot structure - that room equivalent to two additional stories.

Response:

The height of the building is noted as 155 feet in the IS/MND, of which 20 feet may include mechanical penthouse equipment. The IS/MND correctly identifies the height of the proposed building would be 135 feet to the top of the roof or parapet. The IS/MND also correctly notes that a mechanical penthouse component could extend up to 20 feet above the building height.

In addition, the IS/MND provides a detailed discussion of the building's height and an analysis of the proposed Project's impact on the visual character or quality of the surrounding area. Elevation drawings, shade and shadows diagrams, and architectural renderings of the proposed Project are included in the IS/MND. The comment letter mischaracterizes the surrounding area by stating that all of the adjacent buildings are two to three stories in height.

While it is correct that many of the buildings in the surrounding area are two to three stories tall, there is five-story apartment building located on the southwestern side of the Project Site across Beatrice Street (5535 South Westlawn Avenue), and there is a five-level parking structure located adjacent to the Project Site's northeastern side (5401 South Grosvenor Boulevard).

The IS/MND determined that impacts related to visual character and quality would be less than significant, because the design of the proposed building would enhance the visual quality and pedestrian experience of the surrounding area and streetscape by adding an architectural building with fully screened parking, ample setbacks, and enhanced landscaping throughout. Specifically, the proposed Project would provide approximately 48,584 square feet of landscape (e.g., trees, green space, etc.) and 47,198 SF of hardscape (e.g., courtyards, pathways, etc.) throughout the Project Site and on the new building's terraces on the upper levels. In addition, potential light and glare impacts would be mitigated through Mitigation Measures I-120 and I-130, and the parking garage would be screened and in compliance with Mitigation Measure I-200. Lastly, to provide the most conservative analysis for calculating potential shade screening impacts, the up to 20-foot potential mechanical penthouse was factored in to the analysis.

Comment 1-4:

The Air Quality analysis is based upon an old, 2012 Air Quality Management Plan (AQMP). This AQMP has been superseded by a 2016 version. The whole of the Air Quality analysis needs to be re-reviewed and analyzed under the relevant, 2016 AQMP. Similarly, the MND fails to provide for the impacts on air quality caused by the Project being in a Methane Hazard Zone and provides inconsistent information about the anticipated motor vehicle emissions which will result (the MND provides that the average daily weekday traffic associated with the proposed Project is estimated to be 2,200 vehicle trips; the CalEEMod analysis identifies 2,758 daily vehicle trips; while the LL&G traffic study identifies 1,946 daily trips).

Response:

While the air quality analysis refers to the 2012 Air Quality Management Plan (AQMP), the Final 2016 AQMP was published by the South Coast Air Quality Management District (SCAQMD) in March 2017, and at the time of preparation of the environmental document, the Final 2016 AQMP had not been released. The Final 2016 AQMP utilized the 2012 emissions inventory prepared for the 2012 AQMP as the basis for its emissions forecasting. Therefore, the Final 2016 AQMP represents a refinement and advancement of the analyses described in the 2012 AQMP, that were updated to reflect recent drought conditions and new emissions reductions strategies.

The AQMP analysis is focused on a comparison of the proposed Project to regional growth projections and emissions established in each AQMP. However, examining the proposed Project in the context of the Final 2016 AQMP would not change any impact determinations, since implementation of the proposed Project would introduce an incrementally small amount of population, housing, and employment growth into the region relative to Basin-wide emissions inventory. Furthermore, the emissions modeling was rerun upon the release of CalEEMod Version 2016.3.1 to ensure emissions associated with the proposed Project were as accurate as possible. Therefore, no additional quantitative analysis is necessary.

As described in the air quality impacts assessment, implementation of the proposed Project would not cause an air quality violation and would not disproportionately contribute to growth and exceed assumptions incorporated into the 2012 AQMP or the Final 2016 AQMP. Therefore, implementation of the proposed Project would not obstruct emissions reduction strategies outlined in the Final 2016 AQMP and would not delay the demonstrated attainment

date of the 2012 24-hour PM_{2.5} National Ambient Air Quality Standards presented in the Final 2016 AQMP.

The Traffic Impact Study estimates that 2,200 daily trips would result from project implementation. The Traffic Impact Study estimates that existing uses on the site generate 254 daily trips, and that the net daily trip generation would be 1,946 daily trips. The CalEEMod analysis relies upon 2,200 daily trips since it quantifies total project emissions without netting out existing uses. It is unclear where the comment letter obtained the 2,758 daily trips.

Comment 1-5:

The MND admits that the Project would expose people and structures to seismic-related ground failure, including liquefaction, and that the Project site is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and has potential to result in on-or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. In response, it finds that the implementation of Mitigation Measure GEO-1 would reduce impacts to a less than significant level. But Mitigation Measure GEO-1 is nothing more than structural recommendation. A "recommendation" is not a "mitigation measure." CEQA requires that mitigation measures be both feasible and "fully enforceable."

Response:

Building in California is strictly regulated by the California Building Code (CBC) to reduce risks from seismic events and geologic hazards to the maximum extent possible. The currently accepted design standards for seismically induced ground shaking-resistant construction are addressed in the CBC and in the City's Building and Grading Codes. These guidelines are considered minimum standards for the design and construction of buildings and must be incorporated into any final project designs. The City's plan check and permitting process would ensure that the proposed Project adheres to City Building and Grading Code requirements and incorporates structural features and construction methods that meet seismic and geologic safety standards. In regard to the Mitigation Measure GEO-1, the content of this mitigation measure was recommended in the preliminary geotechnical engineering investigation and as such is included as a mandatory mitigation measure.

Adherence to the Regulatory Compliance Measures and Mitigation Measure included in the IS/MND, which are repeated below, would ensure impacts related to geology and soils would be less than significant.

Regulatory Compliance Measures:

- RC-GEO-1 The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety and all other applicable codes and standards.
- RC-GEO-2 Construction activities would be performed in accordance with the requirements of the Los Angeles Building Code and the Los Angeles Regional Water Quality Control Board through the City's Stormwater Management Division.
- RC-GEO-3 The proposed Project shall comply with all applicable standards of South Coast Air Quality Management District Rule 403, the requirements of a Stormwater Pollution Prevention Plan, in accordance with the National Pollutant Discharge Elimination System, and the City's grading permit regulations, which require the implementation of grading and dust control measures.

Mitigation Measures:

GEO 1 The proposed Project shall follow the recommended measures outlined in the preliminary geotechnical engineering investigation to ensure proper structural support in potentially liquefiable soil. These measures may include, but are not limited to:

- The use of Auger Cast Displacement Piles (ACDP).
- Performance of an indicator test pile program prior to installation of production piles.
- Equipping buried utilities and drain lines with flexible or swing joints.

Comment 1-6:

In evaluating the impacts of the Project with regard to hazards and hazardous materials, the MND completely fails to identify, analyze or evaluate the fact that the Project is located in both a Methane Hazard Zone and an Airport Hazard Zone. Relying narrowly on the thresholds, the MND finds that there are no impacts at all with respect to airport or methane related impacts. However, whether or not a particular environmental effect meets a particular threshold cannot be used as an automatic determinant that the effect is or is not significant, and the use of the Guidelines' thresholds does not necessarily equate to compliance with CEQA.

Response:

Although the proposed Project is located in a Methane Hazard Zone, many heavily developed parts of the City are located in Methane Hazard Zones or Methane Buffer Zones. As such, the City has enacted Ordinance No. 175790 and Ordinance No. 180619, which are designed to provide standard measures to control a common hazard in the City. Measures include site testing, detection systems, and venting, which are required as part of the Los Angeles Municipal Code (LAMC). Site testing standards for methane are set as part of the Los Angeles Building Code (LABC). The proposed Project would comply with the LAMC and LABC, and impact determinations regarding hazards would not change.

Regarding the Airport Hazard Zone, the City has established special land use regulations for properties that are located within the approach zone of Los Angeles International Airport (LAX) in order to prevent the creation or establishment of airport hazards. These zoning regulations are primarily directed towards height limits but also address light emissions to avoid potential hazards to aircraft resulting from illuminated signs and structures within Airport Hazard Zones. (LAMC Section 12.50.) The proposed Project is 135 feet in height; inclusion of a 20-foot tall mechanical penthouse brings the maximum height to 155 feet. The Federal Aviation Administration (FAA) height limit for the Project Site is 200 feet above ground level. (Code of Federal Regulations, Part 77.) The proposed Project is less than 200 feet tall, and would not emit light to a degree that would result in a hazard to approaching aircraft. Therefore, the proposed Project be in compliance with City and FAA restrictions and would not pose an airport hazard.

Comment 1-7:

The MND's land use and planning section is deficient. It only evaluates the Project's consistency with the Palms - Mar Vista Del Rey Community Plan. But that is not all that CEQA requires. CEQA requires an analysis of whether the Project conflicts with *any* applicable land use plan, policy or regulation. This includes the applicable Do Real Planning Guidelines, Citywide Design Guidelines, the Southern California Association of Governments ("SCAG") Regional Plan (including SCAG's Regional Transportation Plan and Compass Growth Visioning effort), the South Coast Air Quality Management District Air Quality Management Plan, the Los Angeles County Metropolitan Transportation Authority Congestion Management Program ("CMP"), and the Los Angeles Municipal Code. Consistently with all of these land

use plans must be adequately reviewed and evaluated in order to comply with CEQA. Furthermore, the Project is inconsistent with several Palms - Mar Vista Del Rey Community Plan sections.

Policy 3-1.2 - Ensure *compatibility* between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.

Policy 3-1.3 - Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.

Objective 13-1 - Provide parking in *appropriate* locations in accordance with Citywide standards and community needs.

Objective 16-2 - Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

In order to be legally adequate, an MND cannot selectively pick and choose policies with which it deems a project to be consistent. In order to be legally adequate under CEQA, and MND must identify and discuss these inconsistencies.

Response:

The SCAQMD AQMP is related to air quality and is addressed in the Air Quality section of the IS/MND. After stating the AQMP is designed to meet applicable federal and State requirements, including attainment of ambient air quality standards, the IS/MND evaluates the proposed Project's compliance with the AQMP. The IS/MND states the proposed Project does not include a housing element and would not contribute to population growth. The proposed Project would result in the creation of approximately 641 new jobs (1 employee per 311 SF). Job creation from the proposed Project would represent 0.005 percent of the 108,600 jobs projected by the 2012-2035 RTP/SCS for the City from 2008 to 2020. Project-related population, housing, and job growth would be consistent with population forecasts for the subregion as adopted by SCAG. Therefore, the proposed Project would not conflict with or obstruct implementation of the AQMP, and impacts related to the applicable air quality plan would be less than significant.

The Los Angeles County Metropolitan Transportation Authority Congestion Management Plan (CMP) is addressed in the Transportation and Traffic section of the document, and in the LLG Construction Traffic Analysis. (Initial Study Checklist & Evaluation, Page 3-56; Appendix H, Pages 64-66.) After stating the CMP is a State-mandated program designed to address the impact urban congestion has on local communities and the region as a whole, the IS/MND analyzes why a CMP intersection traffic impact analysis is not required, and impacts would be less than significant. The IS/MND also states no significant impact to any CMP freeway monitoring location would occur, and no detailed CMP freeway mainline analysis is warranted.

As stated in the comment, development of the proposed Project is subject to the LAMC, wherein the Project Site is zoned as M2-1 (Light Manufacturing). The proposed Project has not requested a zone change and will remain zoned as M2-1. Therefore, it is consistent with the LAMC.

Regarding the Citywide Design Guidelines, the proposed Project application submitted to the City included the Citywide Design Guideline Checklist as applied to the proposed Project. City staff reviewed and determined the proposed Project is consistent with the Citywide Design Guidelines checklist.

Regarding SCAG planning documents, the Do Real Planning Guidelines, and Citywide Design Guidelines, the policies, objectives, and goals within the City of Los Angeles General Plan and Community Plans are built upon the regional and City planning initiatives found within the aforementioned documents. As such, by being consistent with the General Plan and the Palms – Mar Vista – Del Rey Community Plan, the proposed Project would be inherently consistent with the wider reaching planning documents. The comment also states that the proposed Project is inconsistent with several Palms – Mar Vista – Del Rey Community Plan policies and objectives, which are addressed below.

Policy 3-1.2: Ensure compatibility between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements.

As stated in the IS/MND, the Project Site's land use and zoning designations are consistent with many of the land uses in the Del Rey neighborhood as it contains much of the community plan area's manufacturing and industrial uses. More specifically, the Project Site is located within an area characterized by a mix of light industrial uses, engineering research and development uses, and supporting office uses, all of which exist compatibly. The proposed Project would also comply with all mandatory environmental protection standards and health and safety requirements. Therefore, the proposed Project would be consistent with the aforementioned policy.

Policy 3-1.3: Require that any proposed development be designed with adequate buffering and landscaping and that the proposed use be compatible with adjacent residential development.

As stated in the IS/MND, the proposed Project would provide approximately 48,584 SF of landscaped area (e.g., trees, green space, etc.) and 47,198 SF of hardscape area (e.g., courtyards, pathways, etc.) throughout the Project Site. The proposed Project's design intends to enhance the visual quality and pedestrian experience of the surrounding area and streetscape by adding an architectural building with fully screened parking, ample setbacks, and enhanced landscaping throughout. Therefore, the proposed Project would be consistent with the aforementioned policy.

Objective 13-1: Provide parking in appropriate locations in accordance with Citywide standards and community needs.

As stated in the IS/MND, the proposed Project would provide two levels of subterranean parking and three above ground parking levels with a total of 845 parking spaces. The proposed 845 provided parking spaces would exceed the number of parking spaces required by the LAMC by 269 spaces. Per comments received on the public hearing for the proposed Project on June 6, 2017, square footages of the proposed Project was revised and parking requirements per LAMC were recalculated. As such, the proposed Project would now exceed the parking spaces required by the LAMC by 259 spaces. Nonetheless, the proposed Project would be consistent with the aforementioned objective.

Objective 16-2: Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

As discussed in the IS/MND, Los Angeles Department of Transportation (LADOT) has reviewed and approved the Traffic Impact Study conducted for the proposed Project. With the implementation of the mitigation measures identified in the IS/MND, LADOT determined the transportation infrastructure is adequate. Therefore, the proposed Project would be consistent with the aforementioned objective.

Comment 1-8:

The MND fails to address the fact that there are sensitive receptors that will be significantly impacted from construction noise including the underestimated volume of excavation and the operation of a large parking facility, the loading area and mobile noise from all of the likely vehicles that will have to turn around at the end of the cul-de-sac. The MND proposes deficient mitigation.

Response:

The IS/MND identifies the following sensitive receptors within the vicinity of the Project Site:

- Multi-family residences located 50 feet to the south across Beatrice Street;
- Single-family residences located approximately 300 feet to the east of the Project Site but approximately 600 feet east of the construction zone;
- 740 Sound Design located adjacent to the Project Site but 350 feet east of the construction zone; and
- Digital Domain located approximately 300 feet west to the west. (Initial Study Checklist & Evaluation, Page 3-40.)

The IS/MND notes that additional sensitive receptors are located within 500 feet of the Project Site; however, these receptors were determined to be somewhat shielded from construction activity by the buildings immediately surrounding the Project Site and that the sensitive receptors identified above represent the nearest sensitive with the potential to be impacted by the proposed Project. The noise analysis included a detailed discussion of construction noise levels that would occur at these sensitive receptors.

The parking facility noise and its potential to increase ambient noise levels is assessed at sensitive receptors in the IS/MND. The subterranean level parking would be partially enclosed, and vehicle noise generated within the structure would not be audible beyond the property line. In addition, parking would be fully screened which would further reduce noise levels. The loading area is located in the proposed Project's northeast corner next to commercial and industrial land uses. These types of land uses are not considered sensitive to noise and the design of the proposed Project took careful consideration to locate noise generating aspects away from sensitive receptors. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas are considered sensitive receptors. Regarding mobile noise along the cul-de-sac, the nearest sensitive receptor is located approximately 400 feet to the south and the uses immediately surrounding it are commercial and industrial uses. Much of mobile noise is generated by vehicles pushing air out of the way as they pass at high speeds. Vehicles travelling along Jandy Place would be at low speeds entering and exiting driveways and would generate minimal noise levels. Furthermore the uses adjacent to the cul-de-sac are located approximately 220 feet south of State Route 90, with vehicles travelling at speeds in excess of 65 miles per hour. Mobile noise generated by the highway would overshadow mobile noise generated by vehicles travelling along Jandy Place. Furthermore, the roadways analyzed in the mobile noise analysis were those identified by the Traffic Impact Study to have the potential to have impacts in the AM or PM peak hour. Jandy Place was not identified as an impacted roadway and would operate at a good level of service under Future Cumulative with Project Conditions.

In addition, the IS/MND described and analyzed the estimated volume of export required for implementation of the proposed Project. In particular, the IS/MND states the proposed Project would include two subterranean level of parking, which would require excavation to a maximum depth of 20 feet (including excavation for project footings and foundations). The excavation depth of 20 feet refers to the extent of sub-grade disturbance, scraping and re-compaction as required below the column footings, and not all excavated material would be exported off-site. Approximately 6,662 tons of demolition debris and 42,000 cubic yards of

excavated materials would be exported from the site. The estimated volume of export is reasonably derived from estimates based on proposed Project plan sets. The export volume was factored into the noise analysis set forth in the IS/MND and it was assumed export activities would happen at the worst traffic hour. In particular, noise levels for the excavation phase assumed 19 haul trucks per hour, and accounted for construction worker trips and delivery truck trips occurring at the same time. This analysis reflects the most conservative, worst case scenario.

Pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. The Project Applicant would be required to comply with the City's standard requirements for construction, which include feasible measures to control noise levels, including installation of engine mufflers, noise blanket barriers, and use of quieter electric equipment. Mitigation Measures XII-27 is intended as a good will measure to inform residents and tenants of construction and to provide an avenue to address public complaints. Mitigation Measures XII-20 through XII-26 would provide a quantitative reduction in noise levels and are more than adequate to minimize impacts on the surrounding sensitive receptors. Therefore, the IS/MND concludes that noise impacts would be less than significant with implementation of mitigation measures.

Comment 1-9:

The MND finds that there is less than significant impact based on possible conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. This conclusion is devoid of supporting substantial evidence. Indeed, the MND fails, at all, to review and analyze consistency with all applicable traffic/transportation plans, including SCAG's Regional Transportation Plan. Accordingly, it is in error.

Furthermore, the MND finds that the Project does not substantially increase hazards due to a design feature or incompatible uses. Although it has numerous options along Beatrice Street and Grovesner Boulevard, the Project is designed to provide *75 percent of its traffic on Jandy Place, an approximately 400-foot in length cul-de-sac street*, which already provides ingress/egress to the many properties owned by Karney Management Company. When considered in connection with the cumulative of effects of all such other traffic along Jandy, it is clear that such Project feature substantially increases hazards thereon. The MND completely ignores this condition.

Finally, the MND fails to analyze construction traffic impacts as well as parking impacts. It is incomprehensible that an adequate transportation/ traffic analysis can be deemed "adequate" without a review of construction traffic and parking. Where an agency fails to abide the informational requirements of CEQA by omitting material necessary to informed decisionmaking and informed public participation, as it has here, harmless error analysis is inapplicable and the agency is deemed to have erred and abused its discretion.

Response:

The Traffic Impact Study conducted for the proposed Project evaluates potential project-related impacts at 26 key intersections in the vicinity of the Project Site. The study intersections were determined in consultation with LADOT staff. The analysis also takes into account the Coastal Transportation Corridor Specific Plan, and impacts were assessed using the impact criteria set forth in LADOT's Traffic Study Policies and Procedures, as well as in coordination with the City of Culver City's Planning Division. LADOT reviewed and approved

the Traffic Impact Study and issued the LADOT TIA Letter concurring with the Traffic Impact Study analysis and conclusions.

Regarding 75 percent of traffic being located along Jandy Place, the proposed Project incorporates four driveways to access on-site parking, two on Jandy Place and two on Beatrice Street. The split between traffic would be 50/50 between Jandy Place and Beatrice Street (25 percent of traffic going through each driveway). The driveway traffic was further analyzed by LLG in the Project Driveway Traffic Analysis Addendum, dated December 14, 2016. The Traffic Addendum concluded that no additional operational analysis of proposed Project driveways is required or recommended.

A detailed construction traffic analysis was conducted for the proposed Project. Construction traffic is also analyzed with respect to Air Quality and Noise and Vibration impacts. The analysis concludes that the construction traffic associated with the proposed Project would not result in any significant traffic impacts at the study intersections. LADOT's TIA Letter confirmed the analysis.

Parking impacts would be less than significant as the proposed Project would provide two levels of subterranean parking, and three above ground parking levels with 845 parking spaces. Per comments received on the public hearing for the proposed Project on June 6, 2017, square footages of the proposed Project was revised and parking requirements per LAMC were recalculated. As such, the proposed Project would now exceed the parking spaces required by the LAMC by 259 spaces. Parking for construction workers would be provided on-site and/or in a nearby lot rented by the Project Applicant. Street parking by construction workers would not be permitted. In addition, the construction of the proposed Project would not require the closure of any vehicle travel lanes.

Comment 1-10:

The MND's "analysis" of cumulative impacts is indefensible. Simply put, the MND admits that significant impacts may occur if the proposed Project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together, but concludes that it does not need to do any analysis of such impacts because each additional project will be evaluated and mitigated on a case by case basis (i.e. *separately* without regard for cumulative impacts); therefore, the cumulative impacts to which the proposed Project would contribute would be less than significant.

Such "analysis" misses the whole point of the cumulative impact analysis required under CEQA. One of the basic and vital informational functions required by CEQA is a thorough analysis of whether the impacts of the Project, in connection with other related projects, are cumulatively considerable. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. Proper cumulative impact analysis is vital under CEQA because the full environmental impact of a proposed Project cannot be gauged in a vacuum. Indeed, one of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact. Therefore, cumulative effects analysis requires consideration of "reasonably foreseeable probable future projects, if any."

In fact, the CEQA Guidelines mandate the preparation of an EIR where cumulative impacts are cumulatively considerable: "An EIR *must* be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual

project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.”

Here, there is no evidence, much less substantial evidence, to support the conclusion that the "cumulative impact" of the Project will not result in any potentially significant impacts. There are no other "reasonably foreseeable probably future projects" listed and none analyzed. Indeed, there is not even evidence that the MND *considered* whether there are cumulative impacts, since all it summarily states is that it did not need to do any such analysis because any additional project will be evaluated and mitigated, separately on a case by case basis.

Ironically, the Project's traffic analysis actually identifies 29 *other* projects in the vicinity of the within Project, and evaluates the cumulative traffic impacts of those projects. The MND cannot ignore that existence of these identified other projects, which their traffic expert apparently had no problem finding or analyzing. It must evaluate the cumulative impacts of all of these projects with regard to all of the protected categories environmental impacts under CEQA.

Finally, the MND conclusively states that cumulative impacts of the Project will not result in any potentially significant impacts because any cumulative impacts (which, again, the MND fails to identify) will be mitigated to a less than significant level through compliance with the mitigation measures provided in the "previous sections" of the MND. But there is no evidence whatsoever that the cumulative impacts of the other reasonably foreseeable probable future projects, if any, were considered in formulating the mitigation measures of the MND and none of them refer, at all, to the other reasonably foreseeable probable future projects, if any. The lack of evidence in the record to support a conclusion that the Project would have *no* cumulative impacts thus tends to support a fair argument that the Project *will* have such impacts. The failure of this MND to provide for a cumulative impact analysis as required under CEQA is fatal.

Response:

“Cumulatively considerable’ means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (§15064(i)(1)) Mitigation may render a project’s contribution less than considerable, as set forth in an MND. An MND may determine a contribution is less than considerable, if project complies with a previously approved plan or mitigation program that includes specific requirement to resolve the cumulative problem.

The IS/MND includes an evaluation of the proposed Project’s cumulative impacts with regard to 29 related projects identified in the Traffic Impact Study. The 29 related projects were quantitatively evaluated in all Traffic analyses, all Air Quality analyses, and all Noise analyses.

The list of 29 related projects was based on information on file at LADOT, Department of City Planning, County of Los Angeles Department of Regional Planning, and Culver City Planning Division. In addition, to provide a conservative, worst case, estimate of future traffic in the Project study area, a new 250,000 square foot office building was assumed on a property located near the Project Site at 5405 Jandy Place, even though there is no formal development application made to the City.

As for the other CEQA Environmental Checklist topics, the cumulative impacts to which the proposed Project would contribute would be less than significant as all potential impacts of the proposed Project were determined to be reduced to less than significant levels with the implementation of regulatory compliance measures or mitigation measures. In addition, none of the related project impacts are close enough to the Project site to have cumulative impacts

in areas such as Aesthetics, Light and Glare, and Public Services. None of the potential impacts are considered cumulatively considerable, as the proposed Project's incremental contribution to cumulative impacts related to Aesthetics, Agriculture/Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Tribal Cultural Resources and Utilities were determined to be less than significant.

Additional Comments:

Outside of the comment period, the offices of Luna & Glushon submitted a second letter that included comments on the project's proposed Mitigated Negative Declaration. The comment letters reiterated many of the same comments previously submitted. In addition, the letter submitted comments from CAJA Environmental Services, LLC. Comments not previously discussed follow below:

Comment 2-1:

Utilities (Energy): The MND scoped out this issue area without sufficient analysis that the Project would have no impacts with respect to utilities and service systems. Additionally, the MND did not take into consideration the recent Porter Ranch gas leak, which has the potential to cost the Southern California Gas Company billions of dollars and may require the curtailment of gas supply to electric generators. The California Public Utilities Commission already has ordered a reduction in the volume of available gas for certain gas storage facilities in the region, which may impact the available supply of natural gas for the Project. This issue was improperly left out of the MND and requires analysis, as well as a full discussion of electricity supply and demand, as required by Appendix F, of the State CEQA Guidelines.

Response:

Per Appendix F of the 2017 CEQA Statutes and Guidelines, EIRs are required to include a discussion of the potential energy impacts of proposed Projects to ensure that energy implications are considered in project decisions. However, the discussions noted above regarding natural gas and electricity supply and demand are only required for EIRs and not IS/MNDs.

Nevertheless, the Utilities and Service Systems analysis was conducted in accordance with the current CEQA Statutes and Guidelines and is sufficient. As stated in the IS/MND, approximately one percent of the proposed Project's energy will be obtained from solar panels installed on-site, per compliance with Section A5.211 of the Guide to the 2016 California Green Building Standards Code – Non-residential. This would be accomplished by 3,330 square feet of rooftop solar panels generating approximately 58 amps at 480V, which equals over 1 percent of the building's electrical service assuming a 5000A 277/480V service requirement. The proposed Project would also incorporate passive environmental lighting, and energy-efficient lighting would be incorporated into the Project's design. Overall the proposed Project would incorporate many features that would reduce its overall electricity consumption.

In addition while of regional concern, the Porter Gas leak is far removed and has no relation to the Project. The Project does not involve a large gas infrastructure project and there is no evidence to suggest that there is an association between the Project and a gas leak approximately 30 miles away from the Project Site. There is no evidence that natural gas supplies available for the Project will be impacted.

In sum, the proposed Project would not result in the inefficient, wasteful and unnecessary consumption of energy. The proposed Project would only result in an incremental increase in

the use of electricity in respect to the overall system and would incorporate green building standards that would reduce energy consumption.

Comment 2-2:

The Project Description (Section 2) Is Inadequate & Does Not Meet CEQA's Requirements. The Project Description is confusing and does not provide an accurate and stable definition of the proposed Project that is easily understood by the public or decision makers. These clarifications are necessary in order for the general public and decision makers to adequately review the MND. It is very unclear at times what the Applicant is proposing. Our findings are below.

- The description of the surrounding uses is inadequate. The MND makes no mention of the existing schools situated to the north and east of the Project Site.

Response:

The IS/MND includes a detailed description of the Project Site in Section 2.0 Project Description of the IS/MND. The Project Description states the Project Site is located within the Palms—Mar Vista—Del Rey Community Plan Area of the City. It includes a figure (Figure 2-1) depicting that the Project Site is roughly bound by the State Route 90 (SR 90), Marina Freeway, to the north (approximately 600 feet from the Project Site) and Jefferson Boulevard to the south. It further states the Project Site is within the Del Rey neighborhood and is currently comprised of five (5) contiguous lots located at 12575 Beatrice Street and 12541 Beatrice Street. It continues that following a lot line adjustment, the Project Site will be comprised of four (4) contiguous lots totaling approximately 196,447 SF. The Project Description further states the Project Site is currently developed with a 23,072-square-foot office building and two accessory buildings of 5,044 and 2,144 square feet at 12575 Beatrice Street, and an 87,881-square-foot office building at 12541 Beatrice Street. (Project Description, Page 2-1.)

The IS/MND includes a detailed description of the surrounding uses. In particular, it notes the Project Site is located within a commercial office and industrial low- and medium-rise, mixed-use neighborhood. A five-story apartment building is located on the southwestern side of the Project Site, across Beatrice Street. Additionally, there are several commercial office and industrial buildings located to the west, north, and southeast of the Project Site. Adjacent to the eastern side of the Project Site are two (2) two-story commercial office/industrial buildings. Further east are single-family homes across Grosvenor Boulevard, filling the area from Hammock Street to Beatrice Street. A five-level parking structure is located adjacent to the Project Site's northeastern side. The Project Description includes a figure (Figure 2-2) depicting the Project Site and the surrounding area (Project Description, Page 2-1.)

In addition, each of the CEQA Environmental Checklist topics addressed in the IS/MND includes a discussion of the environmental setting as it pertains to that particular issue area. In regards to schools, the IS/MND discloses that there are several schools located in the project area, and specifically identifies the Playa del Rey Elementary School located at 12221 Juniette Street in Culver City (Initial Study Checklist & Evaluation, Page 3-30). This is the closest school to the Project Site and the only school within 0.25 mile of the Project Site. As discussed in the IS/MND, the proposed Project would result in no impacts to this school or to other schools in the Project area.

Comment 2-3:

The Project Description states that roughly 3,400 square-feet of the Project would be dedicated (we think) to solely retail and restaurant uses. However, the Traffic Impact Study does not include any retail and restaurant square footages in its trip generation estimates. How much floor area will actually be dedicated to restaurant and dining space for the Project?

These glaring inconsistencies illustrate that the Project Description shifts throughout the MND and makes it impossible to properly assess the significance of Project impacts. Please explain the reasons for the differences in floor area dedicated to restaurant and dining uses under the MND when compared to the Traffic Impact Study.

Response:

As proposed, the Project includes approximately 2,500 SF of café/restaurant use and smaller retail spaces located on the ground floor; and 900 SF of retail space located on the second and third floors. 500 SF of the retail space would be located on the second floor and 400 SF of retail space would be located on the third floor. However, dependent on tenant requirements these spaces may be divided as necessary. In regards to consistency with the traffic study, it is common for office buildings (particularly larger office buildings) to provide tenant services (retail and food-serving uses). These tenant services would generate few, if any, external trips because most patrons will likely be tenants from within the Project, or walk-ins from nearby offices or apartments. Any such external trips are already accounted for in the office vehicle trip generation rates, which are derived based on driveway traffic counts conducted at existing office buildings. This is verified in the description of the office land use provided in the *Trip Generation* manual published by the Institute of Transportation Engineers. For the office land use, it states within the *Trip Generation* manual: "An office building or buildings may contain a mixture of tenants including professional services, insurance companies, investment brokers and tenant services, such as a bank or savings and loan institution, a restaurant or cafeteria and service retail facilities." (ITE, *Trip Generation Manual*, 9th Edition, 2012). Accordingly, there is no need to revise the trip generation forecast for the Project based on the provision for 3,400 SF of retail/café uses on-site as any external vehicle trips that may be generated by this area are already factored into the ITE office trip generation rates.

The project has been conditioned to only permit those accessory commercial uses identified to have a trip generation factor equivalent to a restaurant or cafeteria and service retail facilities or below (as referenced in the ITE *Trip Generation Manual*). The applicant will be required to submit final plans to LADOT to determine if the project conforms to LADOT Case No. CTC15-103799, or if additional review and analysis is required.

Comment 2-4:

Regarding construction, Section 2.3 of the MND states that Project construction "would occur over approximately 22 months." This 22-month figure is used throughout the document, but it understates the actual construction time period required for the Project. The MND goes on to state that several months of infrastructure work would also be required, but since it "would precede" the 22-month construction period, it is not included as part of the overall construction time period. The "infrastructure work" should be properly considered part of the construction work required for the Project and the MND's description of the Project's construction duration makes the length of construction time required appear shorter than is actually proposed for the Project.

Response.

The IS/MND states that the proposed Project would connect to existing utility infrastructure (e.g., water mains, sewer lines, and storm drain inlets), which could require off-site improvements in the adjacent rights-of-way. The Project Description does not describe any construction activities on the Project Site that would precede commencement of the 22-month construction period. It is unclear where the comment originates as the phrases referred to are not included in the Project Description, description of construction activities, or anywhere else in the IS/MND document.

Comment 2-5:

Aesthetics. The Aesthetics Section contains numerous errors, inconsistencies, omissions, and incorrect assumptions and conclusions. They are summarized here.

- The aesthetics impacts of the Project were improperly analyzed. The section does not delve into overall design and compatibility of the building with existing structures and uses in the surrounding area. For example, what are some facade improvements and colors that would complement the area? The overall height of the structure, listed at 135-feet, seems misleading, as the number does not consider the proposed Penthouse on the roof of the proposed structure. Proposed landscaping should also be discussed and show its compatibility with the neighborhood. With this, what is the actual character of the building and would the structure be compatible with the surrounding character, which is not fully disclosed in the MND. This needs to be expanded.

Response.

The IS/MND provides a detailed discussion of the building's height and an analysis of the proposed Project's impact on the visual character or quality of the surrounding area. (Initial Study Checklist & Evaluation, Page 3-2–3-8.) Elevation drawings, shade and shadows diagrams, and architectural renderings of the proposed Project are included in the IS/MND. (Project Description, Pages 2-2–2-7; Initial Study Checklist & Evaluation, Page 3-5–3-7; Appendix A-Additional Architecture Drawings.)

The IS/MND determined that impacts related to visual character and quality would be less than significant, because the design of the proposed building would enhance the visual quality and pedestrian experience of the surrounding area and streetscape by adding an architectural building with fully screened parking, ample setbacks, and enhanced landscaping throughout. Specifically, the proposed Project would provide approximately 48,584 square feet of landscaping (e.g., trees, green space, etc.) and 47,198 square feet of hardscape (e.g., courtyards, pathways, etc.) throughout the Project Site and on the new building's terraces on the upper levels. In addition, potential light and glare impacts would be mitigated through Mitigation Measures I-120 and I-130, and the parking garage would be screened and in compliance with Mitigation Measure I-200.

Lastly, to provide the most conservative analysis for calculating potential shade screening impacts, the up to 20-foot potential mechanical penthouse was factored in to the analysis and the shade screening calculation was 450 feet (derived from 3 x 135 feet for the main structure plus 20 feet for mechanical penthouse).

Comment 2-6:

Regarding shade and shadow sensitive receptors, the MND fails to mention that there exists an outdoor gathering space directly north of the Project Site. According to the *L.A. CEQA Thresholds Guide*, shadow sensitive uses are "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort or commerce. The *L.A. CEQA Thresholds Guide* calls for a determination of whether there are any shadow-sensitive uses to the north, northwest, or northeast of a project, as that is generally the path shadows will be projected. As such, the MND falls inadequate in this analysis. As mentioned, directly north of the Project Site exists an outdoor gathering/seating/eating location for adjacent office building works. The MND fails to identify this particular area as shadow sensitive use, which it is. This needs to be discussed and disclosed in the MND.

Response:

The MND correctly identifies the only shadow-sensitive uses in the immediate vicinity of the Project as the residential apartments on the south side of Beatrice Street. Contrary to the comment, the “outdoor gathering/seating/eating location” associated with the adjacent office use is not considered a shadow sensitive use. According to the *L.A CEQA Thresholds Guide*, shadow sensitive uses are “facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors.” (*L.A CEQA Thresholds Guide*, 2006, Page A.3-1) Outdoor gathering/seating/eating locations associated with office uses are not considered shadow sensitive uses according to the *L.A. CEQA Thresholds Guide*.

Comment 2-7:

Construction Air Quality Impacts. Regarding construction impacts, numerous errors were made with respect to the CalEEMod analysis. These errors resulted in construction air quality impacts being understated. The CalEEMod analysis should be redone using assumptions more consistent with industry standards. Errors and improper assumptions include the following.

- The construction phasing in the CalEEMod analysis conflicts with the Project Description. As identified in the MND, early infrastructure work (e.g., storm drain line, retaining wall, shoring) would precede a 22-month construction period. The CalEEMod analysis uses a 22-month process after the initial infrastructure shoring period. Why is that? What effect does this have on the modeled emissions? Are they lower or higher? This must be explained.
- The CalEEMod air quality analysis assumes a very low level of equipment associated with the construction phases.

Response:

To address the first element of the comment, the entirety of the MND was reviewed and a text search was performed to identify instances of the use of “storm drain,” “retaining wall,” and “shoring.” The phrase “storm drain” does not appear in the Project Description, and is only used in the Hydrology and Water Quality topical discussion (Initial Study Checklist & Evaluation, Page 3-33—3-34) and the Utilities and Service Systems topical discussion (Initial Study Checklist & Evaluation, Page 3-61) of the MND. There is no mention of any storm drain installation that would occur prior to the commencement of demolition activities on the Project Site. This comment is not corroborated by the contents of the MND, as it refers to elements of the project description that do not exist.

The phrases “retaining wall” and “shoring” do not appear at all in the entire document. The Project Description does not describe any construction activities on the Project Site prior to demolition of existing structures. It is unclear where the comment originates as the phrases referred to are not included in the Project Description, description of construction activities, or anywhere else in the IS/MND document. This comment is unsubstantiated and inaccurate.

The latter portion of this comment asserts that the construction equipment inventory utilized in the CalEEMod emissions modeling was too minimal. Minor adjustments were made to the equipment inventory based on Project-specific information describing the types of activities that would occur on the Project Site. However, in reviewing the CalEEMod files, it was determined that the Project equipment inventory was adjusted in the following ways:

Phase	Default Inventory (Number of Equipment)	Project Inventory (Number of Equipment)	Net Change (Number of Equipment)
Demolition	5	9	+4
Site Prep/Clearing	3	3	0
Excavation/Grading	4	7	+3
Building Construction	8	15	+7
Architectural Coating	1	1	0

Review of the CalEEMod files revealed that the Project inventory actually included 17 additional pieces of equipment relative to the default inventory for a Project Site between two and three acres in size. If anything, the analysis represents a conservative estimate of the maximum daily equipment activity during construction of the proposed Project. The comment is unsubstantiated and inaccurate, and reflects a misinterpretation of the emissions modeling for the proposed Project.

Comment 2-8:

Haul trucks are proposed to stage at Jefferson Boulevard south of the Project Site. A CO hot-spot analysis should have been conducted for this staging location, which is adjacent to heavily congested intersections along Jefferson Boulevard.

Response:

This comment suggests that a carbon monoxide (CO) hot-spot analysis should have been conducted for the staging area along Jefferson Boulevard south of the Project Site. Typically, CO hot-spot analyses are no longer required by the SCAQMD and other Lead Agencies due to improvements in vehicle exhaust emissions resulting from programs established by the California Air Resources Board (CARB) to reduce mobile source emissions of criteria pollutants.

In 2003, as part of formulation of the 2003 AQMP, the SCAQMD conducted research on CO concentrations at the most congested intersections within the City of Los Angeles. The SCAQMD determined that the intersection of Wilshire Boulevard and Veteran Avenue in Westwood was the most heavily trafficked at 100,000 daily vehicles, and generated a maximum 1-hour CO concentration of 4.6 ppm. The applicable 1-hour ambient air quality standard (AAQS) for 1-hour CO concentrations is 20 ppm. Therefore, by extrapolation, over 400,000 daily vehicles would need to pass through an intersection in order to exceed the 1-hour CO AAQS. It should be noted that since 2003, vehicle engine emissions have been reduced substantially as a result of CARB program implementation.

The industry standard for traffic impact assessment assumes that approximately 8 to 12 percent of daily vehicle volumes occur during a peak hour, in either the AM or the PM. Based on review of the Traffic Impact Study for the proposed Project, the Existing Traffic Volumes for the study area yielded a maximum AM peak hour vehicle volume of 4,670 and a maximum PM peak hour vehicle volume of 5,101 along Jefferson Boulevard at the intersection of Centinela. Conservatively assuming that the PM peak hour volume only represents approximately 5 percent of daily volumes, the maximum daily traffic at the intersection of Jefferson Boulevard and Centinela Avenue would extrapolate to 102,020 daily vehicles. This volume is within 2 percent of the maximum daily volume at the Wilshire Boulevard and Veteran Avenue intersection from the SCAQMD 2003 AQMP. Therefore, it is unlikely that maximum

1-hour CO concentrations at any intersection within the Project area exceed 5 ppm, which is only 25 percent of the 1-hour CO AAQS.

Construction of the proposed Project would require a maximum of 75 haul trucks per day during excavation and grading activities. (Initial Study Checklist & Evaluation, Page 2-13.) It is unlikely that maximum hourly truck volumes would exceed 10 trucks per hour. The addition of 10 heavy duty trucks to an intersection that experiences a maximum peak hour volume of 5,101 vehicles is not capable of quadrupling CO emissions at the intersection. The comment reflects a lack of understanding regarding current air quality assessment procedures, as the CO hot-spot analysis has become obsolete in recent years due to improvements in engine and fuel technologies and attainment of the AAQS. A CO hot-spot analysis was not and is not warranted for the proposed Project.

Comment 2-8:

A health risk assessment should have been conducted to assess potential impacts to neighboring schools. Although the elementary school is greater than 100-feet from the Project Site, construction is anticipated to last 22 months, though could be longer. Given the high level of diesel emissions and the close proximity of an existing elementary school, a health risk assessment should have been completed. What was the reason for not completing one as part of the MND? Health risks to elementary school kids must be addressed.

Response:

This comment suggests that a health risk assessment should have been conducted to assess potential air quality impacts to neighboring schools surrounding the Project Site. The IS/MND discloses that there are several schools located in the project area, and specifically identifies the Playa del Rey Elementary School being the closest, located approximately 0.25 miles east of the Project Site (Initial Study Checklist & Evaluation, Page 3-30). The other schools near the Project Site are Playa Del Rey Elementary located approximately 0.25 miles east of the Project Site, Marina del Rey Middle School located approximately 0.3 miles north of the Project Site, and the Westside Neighborhood School located approximately 0.41 miles west of the Project Site.

The SCAQMD has prepared a list of land uses that constitute substantial sources of TAC emissions. The list includes: high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gasoline dispensing facilities. These uses have been identified to generate TAC emissions that may cause air quality concerns for nearby sensitive land uses. Office and restaurant uses are not included in the list, as operation of these land uses does not generate substantial TAC emissions. Emissions of air pollutants disperse upon being released into the atmosphere, and SCAQMD research has shown that concentrations of diesel particulate matter (DPM) decrease by over 80 percent between a downwind distance of 20 meters (65 feet, 0.01 miles) and a downwind distance of 500 meters (0.31 miles) from the source of emissions.

The air quality impact assessment in the IS/MND demonstrated that maximum daily emissions of PM₁₀ from on-site sources (construction equipment) would not exceed the SCAQMD localized significance threshold (LST) values. (Initial Study Checklist & Evaluation, Table 3-1.) Furthermore, concentrations of diesel PM₁₀ would decrease by over 80 percent by the time emissions from construction activities reached the nearest school property. (Initial Study Checklist & Evaluation, Page 3-14.) Additionally, the California Air Pollution Control Officers' Association (CAPCOA) recommends a screening distance of 1,000 feet for school siting near substantial sources of air pollution such as distribution centers and rail yards. The schools nearest to the Project Site are located over 1,400 feet away from the Project Site. Therefore, a health risk assessment examining potential exposures of school children to toxic air contaminant emissions generated during construction activities is not warranted. The

comment reflects a poor understanding of current air quality assessment guidance and recommendations regarding health risk assessments.

Comment 2-9:

Operational Air Impacts. Operational air impacts are largely the result of off-site mobile sources. The MND states that "[t]he estimate of total daily trips associated with the proposed Project was based on the Traffic Impact Analysis prepared ..." As discussed below, the Traffic Impact Study substantially understates the number of daily trips, since it uses solely an office use generation for its trips, when clearly there are restaurant and retail uses proposed. As a result, the emission volumes are also understated. Mobile emissions must be recalculated using the correct number of daily trips.

Response:

It is common for office buildings (particularly larger office buildings) to provide tenant services (retail and food-serving uses). These tenant services would generate few, if any external trips because most patrons will likely be tenants from within the project, or walk-ins from nearby offices. Any such external trips are already accounted for in the office vehicle trip generation rates, which are derived based on driveway traffic counts conducted at existing office buildings. This is verified in the description of the office land use provided in the *Trip Generation* manual published by the Institute of Transportation Engineers.

For the office land use, it states within the *Trip Generation* manual: "An office building or buildings may contain a mixture of tenants including professional services, insurance companies, investment brokers and tenant services, such as a bank or savings and loan institution, a restaurant or cafeteria and service retail facilities." (ITE, *Trip Generation Manual*, 9th Edition, 2012) .Accordingly, there is no need to revise the trip generation forecast for the Project based on the provision for 3,400 s.f. of retail/café uses on-site as any external vehicle trips that may be generated by this area are already factored into the ITE office trip generation rates. Therefore, there is no need to revise operational mobile source emissions modeling and operational air quality impacts have not been understated.

Comment 2-10:

Air Quality. The MND states that the proposed Project would not be a source of toxic air contaminants. This ignores the fact that there will be a substantial increase in truck deliveries to the Project Site as a result of the commercial uses that will now need to be serviced. Exposure to TACs is exacerbated by the Project sites location immediately Playa Vista and north of Jefferson Boulevard. The proposed Project contains office uses and restaurant uses, both sensitive land uses. Accordingly, a mobile health risk assessment should have been conducted for the Project's users to ensure that the proposed "Project is not exposing sensitive receptors to substantial concentrations of DPM." (Id.) Please include such an assessment in the MND or explain why it is not included.

Response:

The comment suggests that the proposed Project would be a substantial source of toxic air contaminant (TAC) emissions. The SCAQMD has prepared a list of land uses that constitute substantial sources of TAC emissions. The list includes: high-traffic freeways and roads, distribution centers, rail yards, ports, refineries, chrome plating facilities, perchloroethylene dry cleaners, and large gasoline dispensing facilities. These uses have been identified to generate TAC emissions that may cause air quality concerns for nearby sensitive land uses. Office and restaurant uses are not included in the list, as operation of these land uses does not generate substantial TAC emissions. This comment reflects a misunderstanding of land uses that generate substantial TAC emissions and is not accurate.

The comment also suggests that office uses and restaurant uses are considered sensitive land uses. The SCAQMD has prepared a list of land uses that constitute sensitive receptors, which includes: schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, residences. Offices and restaurants are not on this list, and are not considered sensitive land uses. The comment is inaccurate in its assertion that offices and restaurants are sensitive land uses, reflecting a misunderstanding of SCAQMD guidance on sensitive receptors. This comment is unfounded and invalid.

Comment 2-11:

Air Quality. The Project could also result in a cumulative air quality impact, which was not disclosed for some reason. The proposed growth in population from the Project could exceed the 2020 projections for the City in the adopted 2012 AQMP. As such, the Project would conflict and obstruct implementation of the applicable, federally-approved air quality attainment plan for the region. This potential impact is not recognized. It should have been.

Response:

Population growth only results from introduction of new residential land uses to a region, which subsequently increases the number of people living in that region. The proposed Project would increase employment, but would not directly increase population. (Initial Study Checklist & Evaluation, Page 3-48.) There is no evidence to substantiate the assertion that implementation of the proposed Project would cause population growth and there is no element of the proposed Project that involves residential development. Therefore, it is not possible that implementation of the proposed Project would induce population growth capable of exceeding projections in the 2012 AQMP or the 2016 AQMP, and there is no potential for a cumulative air quality impact. This comment fails to provide any evidence that the Project development would directly contribute to population growth.

Comment 2-12:

Cultural Resources. The Cultural Resources Section does not provide adequate mitigation to reduce a potential impact to a less than significant level - ultimately failing as an informational document.

The proposed MND mitigation mentions that if cultural resources (including archaeological and paleontological resources) are found on-site during grading and excavation, then a qualified archaeologist/paleontologist will evaluate the find. Given the cultural resources environment near the Playa Vista development south of the Project Site (and surrounding area), this mitigation measure is insufficient to mitigate impacts to a less than significant impact. As found in the Village at Playa Vista Final RS-EIR (August 2009), the longer-term placement of buildings in the area would limit future access to the soils underlying the Playa Vista Site that have been rated as having archaeologically and paleontologically high impact significance. With this, mitigation measures were required regarding the location of any potential resources to be included in and archived as part of the treatment plan prior to earthwork being performed. Effective mitigation measures should include an on-site monitor during all building and excavation activities. Similarly, a qualified Archaeologist and Paleontologist should be retained to develop and implement a monitoring program for construction activities that could possibly encounter older sedimentary deposits and/or human remains. The qualified Archaeologist and Paleontologist should also attend a pre-grading/excavation meeting to discuss a monitoring program prior to any earthwork being performed. If cultural resources are found, a qualified Archaeologist and Paleontologist must be required to prepare a report regarding the find and its treatment effort to be submitted to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies. This report must include a description of resources

unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register.

Response:

Contrary to the comment, the IS/MND adequately addressed Cultural Resources. In addition, the IS/MND included regulatory compliance and mitigation measures sufficient to reduce impacts related to archaeological and paleontological resources to less-than-significant levels. These included Regulatory Compliance Measures RC-CR-1 through RC-CR-3, which stated how potential archaeological, paleontological, and human remain resources that may be discovered during excavation will be dealt with in accordance with federal, State and local guidelines. In addition, Mitigation Measure CR-1 also requires an approved Native American monitor will be present during ground disturbing proceedings to further protect and identify archaeological resources. These Regulatory Compliance Measures and Mitigation Measures will mitigate any potential cultural resources impacts to less than significant levels.

Comment 2-13:

Geology and Soils. Per the MND, it is unclear if the proposed grading (and subsequent disturbances to existing soil) are fully detailed and explained in the analysis. As proposed, the Project would excavate soil up to 20-feet in depth. This seems unrealistic for a development that is proposing two-levels of underground parking. Each level would typically be roughly 10-feet in depth. This 20-foot depth number seems to not take into account footings and related structural items needed to support a building of the size proposed. What's more, the Geology section states that groundwater may be encountered less than 30-feet in depth, but provides no mitigation in case groundwater is encountered. This seems confusing and misleading. Also, with these inconsistencies, how are we supposed to know if loss of topsoil and ground surface disturbances are accurately disclosed and presented in the MND? This needs to be discussed in more detail in the MND.

Response:

The IS/MND described and analyzed the estimated volume of export required for implementation of the proposed Project. In particular, the IS/MND states the proposed Project would include two subterranean level of parking, which would require excavation to a maximum depth of 20 feet (including excavation for project footings and foundations). (Initial Study Checklist & Evaluation, Page 2-13.) The excavation depth of 20 feet refers to the extent of sub-grade disturbance, scraping and re-compaction as required below the column footings, and not all excavated material would be exported off-site. As shown in Figures 2-5 to 2-7 of the IS/MND, both parking levels would be approximately 10 feet in depth. However, parking level 0 would be 5 feet above grade and 5 feet below grade, while parking level 00 would be 10 feet below grade, amounting to 15 feet in total below grade for parking. The extra 5 feet in excavation from 15 feet takes into account excavation for Project footings and foundations.

As stated in the IS/MND, during construction, excavation to accommodate subterranean levels may result in penetration of the existing water table and require dewatering. (Initial Study Checklist & Evaluation, Page 3-33.) Any temporary or permanent dewatering program would need to comply with all applicable City and State regulations, in addition to Regulatory Compliance Measures RC-HWQ-1, RC-HWQ-2, and RC-HWQ-3. Therefore, impacts related to groundwater would be reduced to less than significant.

RC-HWQ-1 Prior to issuance of a grading permit, the applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit). The applicant shall provide the Waste

Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants to stormwater runoff as a result of construction activities.

RC-HWQ-2 Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RC-HWQ-3 The applicant shall comply with all mandatory storm water permit requirements (including, but not limited to National Pollutant Discharge Elimination System, Storm Water Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan, and Low Impact Development requirements) at the federal, State and local level.

Comment 2-14:

Greenhouse Gas Emissions. The Greenhouse Gas Emissions Section contains numerous errors, inconsistencies, omissions, incorrect assumptions, and incorrect conclusions - ultimately failing as an informational document. The MND fails to compare the Project's impacts against all applicable climate action plans and policies. When the MND compares the Project's greenhouse gas (GHG) emissions against a draft 2010 threshold of significance raised by SCAQMD Staff during a working group process, it fails to properly conclude that the Project would exceed that draft threshold. The input assumptions used in the CalEEMod analysis also understate potential construction impacts and require updated modeling to properly disclose construction-related impacts. Specific comments are as follows.

- The Regulatory Setting Section of the MND is cursory, outdated, and inaccurate. Some examples are provided below:
- The MND fails as an informational document because it does not analyze the Project's consistency with Executive Orders S-03-05 and B-30-15. These Executive Orders establish mid-term (2030) and long-term (2050) emission reduction targets for the State. The failure to consider the Project's consistency with the State's climate policy of ongoing emissions reductions reflected in the Executive Orders, which importantly are tied to the atmospheric concentrations of GHGs necessary to stabilize the climate, frustrates the State's climate policy and renders the MND legally deficient and inadequate as an informational document. This analysis must be completed.
- The analysis fails to describe whether the Project incorporates sustainability design features in accordance with regulatory compliance measures to reduce vehicle miles traveled and the Project's potential impact.
- Methane (CH₄) is generally emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions. With this, for most nonindustrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous

oxide, and HFCs.: Since the Project is in a Methane Zone per ZIMAS, the Greenhouse Gas Emissions section should look closer at this issue and provide additional analysis.

- Similar to the Air Quality section of the MND, the CalEEMod estimates are based on inconsistent activity data for mobile sources that should be resolved. These items include:
 - As noted above, the construction phasing in the CalEEMod analysis conflicts with information in the Project Description under the MND.
 - As noted previously, the CalEEMod GHG analysis assumes a very low level of equipment associated with the construction phases.
 - Several consistency statements mention that the Project is providing many retail and commercial uses, all of which would contribute to the policies of encouraging the creation of jobs. Similar to other comments that have been presented, the MND conveniently picks and chooses when to mention that they are proposing commercial uses, when in fact, the Project Description illustrates very little retail.

Response:

This comment suggests that the GHG emissions assessment contained numerous methodological errors, which can be addressed topically as follows:

- The MND fails to compare the Project's impacts against all applicable climate action plans and policies.

There is no prescriptive guidance stating that an individual project's GHG emissions must be assessed in the context of all relevant climate action plans and policies. The effects of GHG emissions on climate change are regionally cumulative in nature and an individual project's incremental influence on regional GHG emissions and climate change cannot be effectively measured. Climate action plans are written to guide regional efforts in reducing GHG emissions and improving sustainability through goals, objectives, and strategies that are implemented regionally. The State of California and the City of Los Angeles have adopted policies aimed at reducing GHG emissions and improving energy efficiency in commercial buildings. The MND includes a discussion of building design standards to which the proposed Project will adhere, as well as additional features that will be incorporated to enhance the proposed Project with regards to energy efficiency (Initial Study Checklist & Evaluation, Page 3-27). The discussion and analysis contained in the MND is sufficient.

- The MND compares project emissions to the SCAQMD draft 2010 threshold of significance but does not conclude that the project would exceed the threshold.

This comment is inaccurate in that the GHG emissions analysis in the MND does not compare the GHG emissions generated by the proposed Project to the draft 2010 SCAQMD staff threshold of significance. (Initial Study Checklist & Evaluation, Table 3.7, Page 3-25.) The draft 2010 SCAQMD staff recommendation is discussed to demonstrate that the SCAQMD has not officially promulgated a quantitative GHG emissions threshold for non-industrial projects. The City has also not adopted a quantitative threshold for GHG emissions. Therefore, there is no applicable quantitative threshold for comparison from a regulatory perspective. This comment is inaccurate in suggesting that a comparison was made to the 2010 draft SCAQMD threshold.

- The input assumptions in CalEEMod understate potential construction impacts.

This comment asserts that assumptions in the CalEEMod analysis resulted in construction GHG emissions being understated. Minor adjustments were made to the equipment inventory based on Project-specific information describing the types of activities that would occur on the Project Site. However, in reviewing the CalEEMod files, it was determined that the Project equipment inventory was adjusted in the following ways:

Phase	Default Inventory (Number of Equipment)	Project Inventory (Number of Equipment)	Net Change (Number of Equipment)
Demolition	5	9	+4
Site Prep/Clearing	3	3	0
Excavation/Grading	4	7	+3
Building Construction	8	15	+7
Architectural Coating	1	1	0

Review of the CalEEMod files revealed that the Project inventory actually included 17 additional pieces of equipment relative to the default inventory for a Project Site between two and three acres in size. If anything, the analysis represents a conservative estimate of the maximum daily equipment activity during construction of the proposed Project. The comment is unsubstantiated and inaccurate and reflects a misinterpretation of the emissions modeling for the proposed Project.

- The Regulatory Setting section of the MND is cursory, outdated, and inaccurate.

This comment reflects a misunderstanding of the scope of MND requirements pertaining to regulatory settings discussion. It is not customary to include an extensive discussion of the regulatory setting under each impact assessment topic at the MND level. The regulations included in the assessment of GHG emissions were provided to give context as to why and how GHG emissions are of environmental concern. AB 32 is the foundation upon which GHG emissions assessment within California was developed. State and City policies such as the Title 24 energy efficiency standards and the LA Green Building Code have evolved from the objective of reducing GHG emissions. The consideration of applicable regulations and policies in the MND is adequate and satisfies all requirements for context under CEQA.

- The MND does not analyze the project's consistency with EO S-03-05 and B-30-15.

Executive Orders S-03-05 (2005) and B-30-15 (2015) contain mandates committing the State of California to reduce its statewide GHG emissions inventory to 1990 levels by 2020 and to 40 percent below 1990 levels by 2030, respectively. GHG emissions are cumulative in nature, and emissions reductions are achieved through large-scale enforcement of policies and initiatives to improve sustainability and energy efficiency. To support the requirements of S-03-05 and B-30-15, California continues to improve its statewide CALGreen Code and Title 24 standards for energy efficiency in buildings. Additionally, the City of Los Angeles has promulgated its own LA Green Building Code that is even more aggressive in enhancing sustainability than the statewide programs.

As stated in the MND, the proposed Project will adhere to the requirements of the CALGreen Code and the LA Green Building Code, and will provide electric vehicle (EV) charging stations, energy efficient lighting and plumbing fixtures, and a 20 percent reduction in potable water use. (Initial Study Checklist & Evaluation, Page 3-26.) All of these design features are consistent with statewide and regional programs to reduce GHG emissions, including Executive Orders S-03-05 and B-30-15. Collectively, individual projects embracing these GHG emissions reductions strategies, in combination with City and public transit programs to improve sustainability, will achieve the GHG emissions reductions set forth at the statewide level. It is not appropriate to evaluate an individual

project in the context of these Executive Orders, and therefore the comment is not relevant.

- The MND fails to describe whether the project incorporates sustainability design features in accordance with regulatory compliance measures to reduce VMT and the potential impact.

There is no prescriptive guidance requiring that assessment of GHG emissions from individual projects demonstrate a reduction in VMT. There is also no standard regulatory compliance measure requiring that an individual project reduce VMT. The discussion of GHG emissions assessment acknowledges that the proposed Project will be located in close proximity to numerous public transit opportunities. (3.0 Initial Study & Checklist, Page 3-29.) The potential reduction in VMT due to transit accessibility was not included in the scope of the Traffic Study for the proposed Project. Consequently, the VMT associated with the proposed Project represents a conservative estimate as it does not factor in the number of future employees that may opt to use public transit as a means of commuting. The comment is baseless in that no regulatory compliance measures require demonstrated reductions in VMT regardless of land use type.

- The project is in a Methane Zone according to ZIMAS and therefore the GHG emissions section should be expanded to address naturally occurring methane.

Mobile source GHG emissions associated with the proposed Project were estimated using CalEEMod. The location of the Project Site in a Methane Zone does not have any effect on the quantification of GHG emissions that would be generated by construction activities or future operation of the proposed Project. There is no connection between potential methane hazards in the subsurface and mobile source GHG emissions that would be generated by the proposed Project, which the comment identifies as the primary sources of operational emissions. This comment attempts to draw a connection between two unrelated topics. The comment regarding the Methane Zone discussion should alternatively be directed towards Hazards and Hazardous Materials. Please see Response 3-2 for a discussion of the Methane Zone analysis.

- The construction phasing in the CalEEMod analysis conflicts with the Project Description.

To address this comment, the entirety of the MND was reviewed and a text search was performed to identify instances of the use of “storm drain,” “retaining wall,” and “shoring.” The phrase “storm drain” does not appear in the Project Description, and is only used in the Hydrology and Water Quality topical discussion (3.0 Initial Study Checklist & Evaluation, Page 3-33, 3-34) and the Utilities and Service Systems topical discussion (3.0 Initial Study Checklist & Evaluation, page 3-61) of the MND. There is no mention of any storm drain installation that would occur prior to the commencement of demolition activities on the Project Site. This comment is not corroborated by the contents of the MND, as it refers to elements of the project description that do not exist.

The phrases “retaining wall” and “shoring” do not appear at all in the entire document. The Project Description does not describe any construction activities on the Project Site prior to demolition of existing structures. It is unclear where the comment originates as the phrases referred to are not included in the Project Description, description of construction activities, or anywhere else in the MND document. The phases outlined in the CalEEMod analysis are consistent with the Project Description. This comment is unsubstantiated and inaccurate.

- The GHG emissions analysis assumes a very low level of equipment associated with the construction phases.

This comment asserts that the construction equipment inventory utilized in the CalEEMod emissions modeling was too minimal. Minor adjustments were made to the equipment inventory based on Project-specific information describing the types of activities that would occur on the Project Site. However, in reviewing the CalEEMod files, it was determined that the Project equipment inventory was adjusted in the following ways:

Phase	Default Inventory (Number of Equipment)	Project Inventory (Number of Equipment)	Net Change (Number of Equipment)
Demolition	5	9	+4
Site Prep/Clearing	3	3	0
Excavation/Grading	4	7	+3
Building Construction	8	15	+7
Architectural Coating	1	1	0

Review of the CalEEMod files revealed that the Project inventory actually included 17 additional pieces of equipment relative to the default inventory for a Project Site between two and three acres in size. If anything, the analysis represents a conservative estimate of the maximum daily equipment activity during construction of the proposed Project. The comment is unsubstantiated and inaccurate and reflects a misinterpretation of the emissions modeling for the proposed Project.

- The MND states that the project is providing many retail and commercial uses, but the Project Description illustrates very little retail.

The number and size of the retail and commercial uses is not pertinent to the quantification of GHG emissions or the assessment of those emissions in a regulatory context. The Project Description provides an accurate overview of the types of uses that comprise the proposed Project. Additionally, the non-commercial uses will be used predominantly by the employees of the office building component of the project. There is not an inconsistency between the MND and the Project Description and this comment is not relevant to the assessment of GHG emissions associated with the proposed Project.

Comment 2-15:

Hazards and Hazardous Materials. As mentioned earlier, the MND does not address methane zone impacts. The Project Site is located within the City of Los Angeles Methane Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category. A Methane Gas Investigation Report should be conducted.

The investigation should evaluate existing methane conditions. According to the LADBS, methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation. The Site is located in a Methane Zone, as discussed above, and appropriate mitigation should be listed to reduce potential impacts. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce the scope of such methane impacts.

Response:

Please see Response 3-2. Although the proposed Project is located in a Methane Hazard Zone, many heavily developed parts of the City are located in Methane Hazard Zones or Methane Buffer Zones. As such, the City has enacted Ordinance No. 175790 and Ordinance No. 180619, which are designed to provide standard measures to control a common hazard in the City. Measures include site testing, detection systems, and venting, which are required as part of the LAMC. Site testing standards for methane are set as part of the LABC. The proposed Project would comply with the LAMC and LABC, and impact determinations regarding hazards would not change.

Comment 2-16:

Land Use and Planning. In general, the MND fails to provide a sufficient level of detail or explanation in order to adequately inform the public and decisionmakers of the Project's consistency with the Land Use Policies and Goals. Most of the consistency findings are limited to a few sentences total. A deeper level of consistency should have been developed and thoroughly explored within the MND, especially for a development of this size and scope.

For example, the MND concludes that the Project is consistent with respect to the Land Use and Conservation Elements based primarily on the conclusion that it would not increase impacts as to these Elements over and above those resulting from the existing uses at the Project Site, or based on the fact that the Project is similar to existing uses. What's more, Objective 2-1.1 is listed as a consistent approach to commercial development; however, the proposed Project is mostly Office related uses and does not provide new services to the existing community.

More glaring, it seems that many land use plans and policy documents were left out of the analysis. The table provided in the MND mentions strictly those goals and objectives of the related Community Plan for the area. No mention of the City's Land Use Element, Open Space Element, Safety Element, Public Services Element, and Do Real Planning Guidelines were listed and disclosed. This is a huge oversight. Where is the consistency analysis with the Regional Comprehensive Plan, South Coast Air Quality Management Plan, and others? Also, there is no mention of consistency with the City's LAMC regarding Floor Area Ratio. Open Space, density, parking, and etc.

These are the types of issues that appear to be missing from and improperly addressed under the analysis in the MND that should be disclosed and considered as part of the land use impact analysis.

Response:

The policies, objectives, and goals within the City of Los Angeles General Plan Land Use Element sets forth long-range guidance for future development of the City, and the Community Plans guide the physical development by establishing land use goals and policies at the neighborhood level. (Initial Study Checklist & Evaluation, Page 3-36.)

The Project is located within the Palms-Mar Vista-Del Rey Community Plan (Community Plan). The MND provides a detailed analysis of the Project's consistency with Community Plan policies. (Initial Study Checklist & Evaluation, Table 3-4.) The comment implies that the Project is inconsistent with Community Plan policies and objectives but does not provide specific examples. With respect to Objective 2-1.1, the comment incorrectly states that the objective requires that the Project "provide new services to the existing community." In fact, Objective 2-1.1 seeks only to "provide additional opportunities for new commercial development and services within existing commercial areas," which describes the Project exactly as it brings additional office development (commercial) as well as ground floor retail and café uses (services) to an existing commercial area. The comment incorrectly implies that the Objective seeks "community-serving services" which it does not.

The Project is also consistent with applicable LAMC provisions. The Floor Area Ratio (FAR) is approximately 1:46:1, while the maximum floor area based on the zoning for the Project Site is 1.5:1, as shown in the City of Los Angeles Cover Page for the proposed Project. As stated in the IS/MND, the proposed Project would provide two levels of subterranean parking and three above ground parking levels with a total of 845 parking spaces. The 845 provided parking spaces would exceed the number of parking spaces required by the LAMC by 269 spaces. Per comments received on the public hearing for the proposed Project on June 6, 2017, square footages of the proposed Project was revised and parking requirements per LAMC were recalculated. As such, the proposed Project would now exceed the parking spaces required by the LAMC by 259 spaces. Nonetheless, the proposed Project would be consistent with the LAMC.

Pursuant to the LAMC, Open Space is required for projects with 6 or more residential units in accordance with Section 12.21 G of the Zoning Code. As the proposed Project is a commercial office space, there is no open space requirement. In addition, the SCAQMD AQMP is related to air quality and is addressed in the Air Quality section of the IS/MND. (Initial Study Checklist & Evaluation, Page 3-10.) After stating the AQMP is designed to meet applicable federal and State requirements, including attainment of ambient air quality standards, the IS/MND evaluates the proposed Project's compliance with the AQMP. In particular, the IS/MND states the proposed Project does not include a housing element and would not contribute to population growth.

In sum, the IS/MND adequately addresses applicable land use plans and therefore impacts will be less than significant.

Comment 2-17:

Noise and Vibration. The MND utterly fails to address the fact that there are sensitive receptors that will be significantly impacted from construction noise including the underestimated volume of excavation and the operation of a large parking facility, the loading area and mobile noise from all of the likely vehicles that will have to turn around at the end of the cul-de-sac. To make matters worse, the MND proposes an utterly deficient mitigation measure to address construction noise - Noise XII-27; as complaint line mitigates nothing.

Response:

Contrary to the comment, the IS/MND identifies the following sensitive receptors within the vicinity of the Project Site:

- Multi-family residences located 50 feet to the south across Beatrice Street;
- Single-family residences located approximately 300 feet to the east of the Project Site but approximately 600 feet east of the construction zone;
- 740 Sound Design located adjacent to the Project Site but 350 feet east of the construction zone; and
- Digital Domain located approximately 300 feet west to the west. (Initial Study Checklist & Evaluation, Page 3-40.)

The IS/MND notes that additional sensitive receptors are located within 500 feet of the Project Site; however, these receptors were determined to be somewhat shielded from construction activity by the buildings immediately surrounding the Project Site and that the sensitive receptors identified above represent the nearest sensitive with the potential to be impacted by the proposed Project. (Initial Study Checklist & Evaluation, Pages 3-40—3-41.) The noise analysis included a detailed discussion of construction noise levels that would occur at these sensitive receptors. (Initial Study Checklist & Evaluation, Pages 3-39—3-48.)

The Project's parking noise and its potential to increase ambient noise levels is assessed at sensitive receptors in the IS/MND. (Initial Study Checklist & Evaluation, Page 3-44, Table 3-11.) The subterranean level parking would be partially enclosed, and vehicle noise generated within the structure would not be audible beyond the property line. In addition, parking would be fully screened which would further reduce noise levels. The loading area is located in the proposed Project's northeast corner next to commercial and industrial land uses. These types of land uses are not considered sensitive to noise and the design of the proposed Project took careful consideration to locate noise generating aspects away from sensitive receptors. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas are considered sensitive receptors.

In regards to mobile noise along the cul-de-sac, the nearest sensitive receptor is located approximately 400 feet to the south and the uses immediately surrounding it are commercial and industrial uses. The majority of mobile noise is generated by vehicles pushing air out of the way as they pass at high speeds. Vehicles travelling along Jandy Place would be at low speeds entering and exiting driveways and would generate minimal noise levels. Furthermore the uses adjacent to the cul-de-sac are located approximately 220 feet south of State Route 90, with vehicles travelling at speeds in excess of 65 miles per hour. Mobile noise generated by the highway would overshadow mobile noise generated by vehicles travelling along Jandy Place. Furthermore, the roadways analyzed in the mobile noise analysis were those identified by the Traffic Impact Study to have the potential to have impacts in the AM or PM peak hour. (Initial Study Checklist & Evaluation, Table 3-10, Page 3-43.) Jandy Place was not identified as an impacted roadway and would operate at a good level of service under Future Cumulative with Project Conditions. (Appendix H – Traffic Impact Study, Page 59; Appendix H – Driveway Traffic Analysis Addendum, Page 3.)

In addition, the IS/MND described and analyzed the estimated volume of export required for implementation of the proposed Project. In particular, the IS/MND states the proposed Project would include two subterranean levels of parking, which would require excavation to a maximum depth of 20 feet (including excavation for project footings and foundations). The excavation depth of 20 feet refers to the extent of sub-grade disturbance, scraping and re-compaction as required below the column footings, and not all excavated material would be exported off-site. Approximately 6,662 tons of demolition debris and 42,000 cubic yards of excavated materials would be exported from the site. (Project Description, Page 2-13.) The estimated volume of export is reasonably derived from estimates based on Project plan sets. The export volume was factored into the noise analysis set forth in the IS/MND and it was assumed export activities would happen at the worst traffic hour. In particular, noise levels for the excavation phase assumed 19 haul trucks per hour, and accounted for construction worker trips and delivery truck trips occurring at the same time. This analysis reflects the most conservative, worst case scenario. (Initial Study Checklist & Evaluation, Page 3-43.)

Pursuant to LAMC Section 112.05, construction noise levels are exempt from the 75 dBA noise threshold if all technically feasible noise attenuation measures are implemented. The Project Applicant would be required to comply with the City's Standard Conditions of Approval (Regulatory Compliance Measures RC-NO-1 through RC-NO-3) and implement Mitigation Measures XII-20 through XII-27, which are feasible measures to control noise levels, including installation of engine mufflers, noise blanket barriers, and use of quieter electric equipment. Mitigation Measures XII-27 is intended as notification measure to inform residents and tenants of construction and to provide an avenue to address public complaints; as such, the measure can allow affected individuals to reschedule activities or otherwise avoid unexpected noise levels. Mitigation Measures XII-20 through XII-26 would provide a quantitative reduction in noise levels and are more than adequate to minimize impacts on the surrounding sensitive receptors. Therefore, the IS/MND concludes that noise impacts would be less than significant with implementation of mitigation measures.

Comment 2-18:

Public Services. With regard to Fire Protection Services, the MND falls flat and does not disclose true potential impacts. In particular, is the Project considered a high-rise structure per LAMC requirements? This is not discussed nor disclosed. This is important since many fire code requirements need to be implemented into the overall design of the Project building. Is a Heli-Pad needed, since the buildings may be considered a high-rise structure? Also, since the Fire Protection Services sections does not provide sufficient detail on existing equipment mix of existing fire stations, are new ladder trucks needed, and if so, how many would be required? This could be a potentially significant impact prior to mitigation measures being incorporated. This needs to be disclosed. With this, are sprinklers required on each floor of the building, due to the overall height of the building and distance to the nearest fire station? It seems the MND is deficient in this area and needs to be revised accordingly.

Response:

Per LAMC Section 91.8604.6.3, a high-rise building is a building of any type of construction having floors (as measured from the top of the floor surface) that may be used for human occupancy located more than 75 feet above the lowest floor level having building access. As such, the proposed Project would be considered a high-rise building. The helipad requirement was removed from the LAMC and is not required for the proposed Project. The proposed Project would comply with all applicable standards regarding LAFD fire protection services (Regulatory Compliance Measure **RC-PS-1** through **RC-PS-8**). (Initial Study Checklist & Evaluation, Page 3-49). The building would incorporate automatic sprinkler systems on every level per requirements set by LAFD. The Project plans will be subject to all requirements of the Building and Safety plan check process, and all required fire protection measures will be implemented prior to issuance of building permit. Thus, with incorporation of the below Regulatory Compliance Measures the Project would have a less than significant impact related to fire protection services.

- RC-PS-1** The proposed Project shall comply with the 2014 Fire Code and any subsequent codes at the time of building permits, including the requirements for automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.).
- RC-PS-2** The plot plan shall be submitted to the Los Angeles Fire Department (LAFD) for review and approval, and shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant.
- RC-PS-3** A plot plan shall be submitted to the LAFD for review and approval prior to occupancy of the proposed Project, which shall provide the capacity of the fire mains serving the Project Site. Any required upgrades shall be identified and implemented prior to occupancy of the proposed Project
- RC-PS-4** Prior to occupancy of the proposed Project, an emergency response plan shall be submitted to the LAFD. The emergency response plan would include, but not be limited to, the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Any required modifications shall be identified and implemented prior to occupancy of the proposed Project.
- RC-PS-5** The construction contractors and work crews shall (1) properly maintain the mechanical equipment according to best practices and the manufacturers' procedures; (2) ensure proper storage of flammable materials; and (3) cleanup of spills of flammable liquid.

- RC-PS-6** If there are partial closures to streets surrounding the Project Site, flagmen shall be used to facilitate the traffic flow until the street closure around the construction is complete.
- RC-PS-7** During demolition and construction, LAFD access from major roadways shall remain clear and unobstructed.
- RC-PS-8** The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structures.

Comment 2-19:

Utilities and Service Systems. The Utilities and Service Systems Section does not provide adequate information and is ultimately failing as an informational document. Our firm's comments on the MND are listed below:

- Projected water during construction use must be calculated based on total water usage and not average daily consumption, similar to how Air Quality impacts are calculated. Since the time period required for construction has been extended, construction activities associated with construction will require greater water consumption.
- Not only has the duration of construction is confusing, but the extent and intensity of construction is also unclear. There is no analysis regarding the potential for the increased levels of water demand required for the increased amount of excavation required for the Project.
- The forecasted water supplies assume that state mandated conservation requirements will continue to apply throughout the life of the Project. Please provide an analysis of what happens if the current State mandated measures are relaxed or eliminated.

Response:

The duration of construction is 22 months and it has not been extended. (See Response 3-11 and 3-15, above.) The excavation has not increased since the time of completion of the Air Quality analysis. Neither water consumption from daily construction or excavation would increase, as the construction time period has not increased. Water used during the construction would be minimal and would not cause any significant impacts on water supply. No new evidence has been provided to contradict the assumptions in the IS/MND.

The forecasted water supply in the IS/MND is based off of Los Angeles Department of Water and Power's (LADWP) Urban Water Management Plan (UWMP). UWMPs are prepared by California's urban water suppliers to support their long-term resource planning, and ensure adequate water supplies are available to meet existing and future water demands. Planning is done over a 20 year horizon, with new plans being released every five years. As such, the current forecasted water supplies are applicable up to the year 2030. (California Department of Water Resources, Urban Water Management Plans.) Furthermore, these plans account for any foreseeable changes in State mandated measures or legislation that would affect the water supply.

As stated in the IS/MND, LADWP conducts water planning based on a econometric water demand forecasting approach. Water demand is projected by major category (single-family, multi-family, commercial, industrial, and government) as well as weather conditions.¹ From 2015 to 2025 the City's water demand is expected to grow by 60,800 acre-feet, with water supplies matching this number.² Accordingly, the 257,600 gpd increase in water usage

¹LADWP, 2010 *Urban Water Management Plan*, 2010.

²One acre-foot is equivalent to 325,851 gallons.

resulting from the proposed Project would not be considered substantial in consideration of anticipated growth. (Initial Study Checklist & Evaluation, Pages 3-60 to 3-61.)

Additional Traffic Comments. Supplemental to the second comment letter submitted by Luna & Glushon, Kimley-Horn reviewed the Traffic Impact Study for 12575 Beatrice Street Office Project (NSB Project) dated July 11, 2016, which was prepared by Linscott, Law & Greenspan, Engineers (LLG). This brief review was completed for Karney Management. The NSB project is expected to generate 1,946 daily trips with 275 AM peak hour trips and 334 PM peak hour trips. Primary access is being proposed on Jandy Place, which is a two-lane local street cul-de-sac with very limited ability to handle high vehicular traffic.

Comment 3-1:

The study indicates that 75 percent of the project traffic will be utilizing Jandy Place. It is also understood that all the project delivery and truck access will be off Jandy Place in addition to the proposed food trucks area. It is anticipated that Jandy Place will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles.

A thorough analysis of this short street segment, as well as Beatrice and Westlawn, should be completed to understand if there are any adverse effects from the proposed Project on traffic, pedestrian, and emergency vehicle access. Below is a summary of the traffic study.

Response:

The comment restates the Project trip generation provided in Table 7-1, Page 31 of the LLG traffic study. The statement in the K-H memo regarding "...75 percent of project traffic will be utilizing Jandy Place..." is not correct. The assignment of project traffic as provided in the LLG traffic study was augmented by the LLG supplemental traffic analysis, which evaluated the currently proposed Project design feature which will provide two driveways on Beatrice Street and two driveways on Jandy Place. It is expected that project traffic will equally utilize the driveways on Beatrice Street and Jandy Place (i.e., a 50/50 split of Project traffic between Beatrice Street and Jandy Place).

The comment accurately states that project delivery and truck access will be off of Jandy Place. This truck access will be through a drive aisle shielded from neighboring uses and provides adequate space for trucks to turn around.

The claim in the comment that Jandy Place "...will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles..." is a mere assertion made without data or analysis to support this assertion. This assertion also does not reflect the thorough analysis provided in the LLG traffic study and LLG supplemental traffic analysis.

Based on traffic count data provided in Appendix C of the LLG traffic study, currently 69 cars (61 northbound, 8 southbound) use Jandy Place in the AM peak hour. Similarly, 83 cars currently use Jandy Place in the PM peak hour (14 northbound, 69 southbound). The Project is forecast to add 138 trips to Jandy Place in the AM peak hour (121 inbound, 17 outbound) and 167 trips in the PM peak hour (28 northbound, 139 southbound).

In total, Jandy Place is forecast to accommodate 207 trips in the AM peak hour and 250 trips in the PM peak hour. This is equivalent to approximately 4 cars per minute using Jandy Place during the peak hours of traffic following construction and occupancy of the Project. The potential use of Jandy Place by one car every approximately 15 seconds does not constitute

a “hazardous situation” or an impediment to emergency vehicle access as asserted in the K-H memo.

Further, Table 1 within the LLG supplemental traffic analysis provides a summary of the Level of Service calculations for the Project’s Jandy Place driveways in the Existing + Project and Future + Project conditions. As shown in Table 1, a driveway balance assuming a 50/50 split of Project traffic to Jandy Place and Beatrice Street would result in LOS A and B conditions at the Jandy Place driveways during the weekday AM and PM peak hours, respectively. The average wait time for a motorist exiting the garage onto Jandy Place would be less than 10 seconds in the AM peak hour and less than 11 seconds during the PM peak hour in the Future + Project condition. This rate of egress does not constitute “severe congestion” as asserted in the K-H memo.

In addition, LADOT has recommended implementation of the Applicant’s proposed voluntary safety measure to close the Jandy Place ingress and egress during peak weekday lunch hours. To enhance pedestrian safety along Jandy Place, the Project’s Jandy Place ingress and egress will be closed weekdays between 12:30 PM and 1:30 PM. Also, in connection with the already-agreed upon future traffic signal warrant analysis, the Applicant has agreed to submit an analysis of Jandy Place driveway operations after one year of Project operation to assess peak hour traffic flows, obtain LADOT review, and adjust driveway operations if warranted.⁵

Comment 3-2:

Study Intersections - The study Included analysis of internal intersections adjacent to the Project Site as well as the following additional intersections.

- Lincoln Boulevard / Marina Pointe Drive - Maxella Avenue
- Lincoln Boulevard / SR-90 Ramps
- Mindanao Way / SR-90 WB Ramps
- Mindanao Way / SR-9D EB Ramps
- Westlawn Avenue / Bluff Creek Drive

Response:

The comment lists five of the study intersections evaluated in the LLG traffic study. In fact, the potential traffic impacts of the Project were evaluated at 26 off-site intersections, plus two additional intersections (Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street) for traffic signal warrants. Thus, a total of 28 intersections were comprehensively evaluated within the LLG traffic study. The list of study intersections is provided on Pages 7 and 8 of the LLG traffic study.

Comment 3-3:

NSB site plan shows 3 proposed driveways.

- Per NSB Project Site plan, the driveway along Beatrice Street is approx. 100' due west of Westlawn Avenue. There is no driveway at Beatrice/Westlawn.
- The driveways along Jandy Place seem to be directly opposing the proposed driveway for Jandy project. They do show that these driveways are the primary access driveways (75 percent of their project traffic uses this driveway to enter and exit site)
- There is a service driveway at the end of their site on Jandy within the cul-de-sac area but no additional information such as frequency of service vehicles, size of vehicles, etc has been included.

Response:

The comment provides a discussion of the Project driveways. See Response to Comment 4-1, above, which clarifies that the current Project site plan includes two driveways on Jandy Place and two driveways on Beatrice Street, resulting in a forecast assignment of 50 percent of Project traffic to Beatrice Street. Contrary to the statement in the comment regarding service vehicle access, the LLG traffic study (Page 6) provides a discussion regarding access for service vehicles, including anticipated size and type of vehicles. While the precise number of service vehicles cannot be forecast, it is reasonable to expect that the number of vehicles would be similar to an office building of similar size.

Comment 3-4:

Signal Warrant- NSB traffic study Includes four hour and peak hour warrants. The study indicates the following:

- At Jandy/Beatrice, peak hour warrant is met for Future plus Project conditions
- At Westlawn/Beatrice, four-hour warrant is met for Future plus Project conditions

Response:

The comment correctly summarizes the analysis and findings of the traffic signal warrants analysis provided in the LLG traffic study prepared for the Jandy Place/Beatrice Street and Westlawn Avenue/Beatrice Street intersections (see, for example, Table 13-1 on Page 63 of the LLG traffic study). Further, LADOT recommended on Page 4 of its assessment letter⁶ prepared for the Project that the two intersections should be monitored for a period of three years following 80 percent occupancy of the Project, with a traffic signal installed at one or both locations if determined to be warranted by LADOT.

Comment 3-5:

Impacts - NSB study indicates significant project impacts at 3 study intersections. Proposed mitigation measure includes re-striping and signal timing improvements

- Westlawn/Jefferson
- Grosvenor/Jefferson
- Centinela/Campus Center Dr (Jefferson)

Response:

The comment correctly summarizes the analysis and findings of the off-site traffic impact analysis provided in the LLG traffic study prepared for the 28 study intersections (see, for example, Table 9-1 on Pages 39 and 40 of the LLG traffic study). The LLG traffic study identifies significant traffic impacts due to the Project at the three intersections listed in the comment. Mitigation measures for the three intersections are provided in the LLG traffic study on Page 52 through 56, and incorporated into the Mitigated Negative Declaration prepared for the Project. The mitigation measures are also restated on Page 4 of the LADOT assessment letter. With implementation of the recommended traffic mitigation measures, the traffic impacts of the Project would be reduced to levels of insignificance.

On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that there is no substantial evidence that the proposed project will have a significant effect on the environment. Mitigated Negative Declaration ENV-2016-1209-MND reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Department of City Planning in Room 750, 200 North Spring Street.

EXHIBIT C

AA-2017-397-PMEX-1A LOD

ENV-2020-3533-EIR

MARCH 13, 2025



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: NOV 19 2018

Case No. AA-2017-397-PMEX-1A
CEQA: ENV-2016-1209-MND
Plan Area: Palms-Mar Vista-Del Rey
Related Cases: CPC-2016-1208-CU-SPR-1A

Council District: 11 – Bonin

Project Site: 12531-12575 West Beatrice Street;
5410, 5416, 5454 South Jandy Place

Applicant: Kevin Mansfield, NSB Associates, Inc.
Representative:

Appellant: Susanna Karney Flaster, Karney Management Co.

At its meeting of **October 25, 2018**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

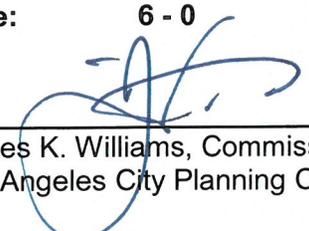
A Parcel Map Exemption (Lot Line Adjustment) to the boundary lines between three legal lots under the same ownership.

1. **Found**, based on the independent judgement of the Los Angeles City Council, after consideration of the whole of the administrative record, the project was assessed in Mitigated Negative Declaration No. ENV-2016-1209-MND, adopted on February 7, 2018 by the Los Angeles City Council, and pursuant to CEQA Guidelines, Sections 15162 and 15164, no subsequent EIR, negative declaration, or addendum is required for approval of the project; and
2. **Denied** the appeal and **sustained** the action of the Deputy Advisory Agency in approving the Parcel Map Exemption.

The vote proceeded as follows:

Moved: Ambroz
Second: Khorsand
Ayes: Choe, Mack, Millman, Dake Wilson
Recused: Perlman
Absent: Mitchell, Padilla-Campos

Vote: 6 - 0



James K. Williams, Commission Executive Assistant II
Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final and not further appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Deputy Advisory Agency's Determination Letter dated June 7, 2018

c: Bob Duenas, Senior City Planner
Marc Woerschling, City Planner

**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

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JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT
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CITY OF LOS ANGELES
CALIFORNIA



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<http://planning.lacity.org>

June 7, 2018

SLG Partners, LLC and
FNL/ Beatrice Partners, LLC (O)
433 North Camden Drive, Suite 820
Beverly Hills, CA 90210

NSB Associates, Inc. (A)
433 North Camden Drive, Suite 820
Beverly Hills, CA 90210

Michael Chait (R)
Chait & Company, Inc.
7306 Coldwater Canyon Ave
North Hollywood, CA 91605

Parcel Map Exemption No. AA-2017-397-PMEX
Zone: M2-1
Council District No. 11
District Map No. 105 B 161

The Advisory Agency has found the adjustment of the common lot line(s) between the parcels on the map dated May 5, 2017 at 12531-12575 W. Beatrice Street and 5410, 5416 and 5454 S. Jandy Place. to be exempt from a parcel map, (Municipal Code Section 17.50-B,3(c)).

HOWEVER, ALL REQUIRED DOCUMENTS (SEE ATTACHED) MUST BE RECORDED TO LEGALLY ADJUST THE LOT LINE, AND COPIES RETURNED TO 201 NORTH FIGUEROA STREET, ROOM 525, LOS ANGELES, CA 90012.

The approval does not relieve the owners from other applicable sections of the Municipal Code, nor from the responsibility for the correct legal descriptions on all documents. Further, the Advisory Agency finds that the adjustment of the common lot line(s), is a ministerial action and exempt from the requirements of the California Environmental Quality Act (CEQA) pursuant to Public Resources Code Section 21080(b)(1).

The above action becomes effective upon the mailing of this letter, unless an appeal has been submitted in person on Form CP-7769 before 5:00 p.m. by June, 22 2018.

Vincent P. Bertoni, AICP
Advisory Agency

MARCUS B. WOERSHING
Deputy Advisory Agency

MBW:DW

CP-1842 (08/20/13)

Attachment - Required Documents and Procedures

REQUIRED DOCUMENTS AND PROCEDURES TO COMPLETE A LOT LINE ADJUSTMENT

Now that the Deputy Advisory Agency has approved your lot line adjustment, if an ownership has deeds of trust, provide appropriate proof of beneficiary approval (reconveyance or beneficiary approval letter) and submit with all required deeds to assigned staff: **201 North Figueroa St, Room 525, Los Angeles, CA 90012.**

DEED REVIEW & APPROVAL

New Grant Deeds, Trust Deeds, etc., will be reviewed and stamped by staff. Deeds must be signed and notarized. Upon approval of the deeds, a Certificate of Compliance (C of C) will be issued **DO NOT RECORD ANY GRANT DEEDS PRIOR TO STAFF REVIEW.** (Recorded deeds without City stamp will not be accepted). Once review is completed staff will return all original documentation to the applicant and it's the responsibility of the applicant to record all documents with the Los Angeles County Recorder's Office.

PREPARATION OF DEEDS

- **Use a standard Grant Deed**
- For all deeds, type **See Exhibits A and B** in the space for legal description. (Attach the appropriate legal descriptions (Exhibit A) and approved map (Exhibit B) to the deeds.) Also, to avoid tax reassessment, the face of the deed(s) should state:

THE RECORDING IS NOT FOR CONSIDERATION BUT FOR THE PURPOSE OF ADJUSTING THE BOUNDARY LINES PER LOT LINE ADJUSTMENT CASE NO. AA-2017-397-PMEX.

- **Single Comprehensive Deed:** **Comprehensive** means a deed wherein the parcels after a conveyance are legally described and the **grantor** and **grantee** are the same. When the adjustment involves multiple parcels owned by a common ownership only 1 deed is required.
- **Multiple Deeds:** When the adjustment involves multiple ownerships, where one ownership is transferring or conveying a portion of property to another ownership, one or more grant deeds must be prepared as follows:
- **Conveyance Deed:** Prepare a deed(s) for each conveyance of portions of property from one ownership (the grantor) to another ownership (the grantee).
- **Comprehensive Single Ownership Deed:** Prepare a **Single Comprehensive Ownership Deed**, as explained above, **for each separate ownership involved.**

LEGAL DESCRIPTIONS

All legal descriptions for areas to be conveyed and legal descriptions for the adjusted properties must be typed on individual 8½ x 11 paper.

However, when the adjustment involves a common ownership of multiple parcels, the adjusted parcels should be listed sequentially and labeled Parcels 1, 2, 3, etc.

FINAL APPROVAL

The Lot Line Adjustment Approval shall be effective for a period of 3 year from the date of approval by the Advisory Agency during which time it must be recorded at the Los Angeles County Recorder's office.

Lapsing of Approval

The Lot Line Adjustment Approval shall lapse if:

- a. The Certificate of Compliance for a Lot Line Adjustment is not recorded within the required time limit.
- b. The Certificate of Compliance for a Lot Line Adjustment has been improperly recorded without the satisfactory completion of all conditions attached to the approval.
- c. The final recording is a departure from the approved map.

FINAL COMPLETION

In order to have final completion of the Lot Line Adjustment, **Return one certified copy of all deeds and three certified copies of the C of C's** to assigned staff at: **201 North Figueroa Street, Room 525, Los Angeles, CA 90012.**

EXHIBIT D

Mitigation Monitoring Program

ENV-2020-3533-EIR

MARCH 13, 2025

IV. Mitigation Monitoring Program

IV. Mitigation Monitoring Program

1. Introduction

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

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

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDF) and applies mitigation measures (MM) needed to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the PDFs and MMs identified for the Project.

2. Organization

As shown on the following pages, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- Enforcement Agency: The agency with the power to enforce the PDF or MM.

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

3. Administrative Procedures and Enforcement

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

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

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

4. Program Modification

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will

determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

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

5. Mitigation Monitoring Program

A. Aesthetics

Project Design Feature AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project site to screen construction activity from view at the street level.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction
- **Action Indicating Compliance:** Field inspection sign-off

Project Design Feature AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or

temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

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

Project Design Feature AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent properties, the public right-of-way, or from above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

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

Project Design Feature AES-PDF-4: New on-site utilities that may be required to serve the Project will be installed underground.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy

- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature AES-PDF-5: All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or the public right-of-way.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature AES-PDF-6: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements will be permitted.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action(s) Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature AES-PDF-7: Above-grade parking will be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action(s) Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature AES-PDF-8: The applicant will plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.

- **Enforcement Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

B. Air Quality

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators would be used during construction.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections during construction

- **Action Indicating Compliance:** Field inspection sign-off

C. Cultural Resources

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the South Central Coastal Information Center and the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction (during grading and excavation)
- **Monitoring Frequency:** Once, prior to demolition; Periodically during grading and excavation activities as determined by consultation with qualified archaeologist
- **Action Indicating Compliance:** Letter of Retention submitted to Los Angeles Department of City Planning (Pre-Construction); Submittal of compliance report by a qualified archaeologist (Construction); If unanticipated discoveries are found, submittal of survey, study, or report evaluating the impact (Construction)

D. Geology and Soils

Mitigation Measure GEO-MM-1: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being

excavated. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction (during grading and excavation)
- **Monitoring Frequency:** Periodically during grading and excavation activities as determined by consultation with the qualified paleontologist
- **Action Indicating Compliance:** Letter of Retention submitted to Los Angeles Department of City Planning (Pre-Construction); Submittal of compliance report by a qualified paleontologist (Construction); If unanticipated discoveries are found, submittal of survey, study, or report by a qualified paleontologist (Construction)

E. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental sustainability, including, but not limited to, Energy Star appliances, plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code, weather-based irrigation system, and water-efficient landscaping.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check prior to plan approval; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

F. Noise

(1) Project Design Features

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Where feasible, electric construction equipment and/or other noise-reducing best practices will be utilized/implemented near sensitive receptors.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodically during construction
- **Action Indicating Compliance:** Field inspection sign-off

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the acoustic line-of-sight from the equipment to the off-site noise-sensitive receptors.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction

- **Monitoring Frequency:** Once at plan check prior to plan approval; Once at field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

(2) Mitigation Measures

Mitigation Measure NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project site between the construction areas and receptor locations R1 and R3. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor locations R1 and 5-dBA at receptor location R3.
- Along the western property line of the Project site between the construction areas and the receptor location R5. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R5.
- During the off-site improvements construction—Provide a temporary moveable noise barrier between the construction equipment and the residences along the south side of Beatrice Street (receptor locations R1 and R3) and along the east side of Grosvenor Boulevard (receptor location R2), where feasible. The temporary noise barrier shall be designed to provide a minimum 10-dBA at the ground level of receptor location R1, 8-dBA at receptor location R2, and 5-dBA at receptor location R3.
- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Field inspection sign-off and submittal of compliance report from noise consultant (Construction)

G. Public Services —Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures, including security fencing, lighting, locked entry, and regular security patrols during non-construction hours.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at plan check; Periodic field inspections
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Field inspection sign-off (Construction)

Project Design Feature POL-PDF-2: The Project will include security measures for entry into the building and parking area, including a keycard system:

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature POL-PDF-3: The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection prior to issuance of a Certificate of Occupancy

- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature POL-PDF-5: The Project will design entrances to and exits from the building, open spaces around the building, and pedestrian walkways to be open and in view of surrounding sites.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety;
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

Project Design Feature POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention features into the building design and operation. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

- **Enforcement Agency:** City of Los Angeles Police Department; City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

- **Monitoring Agency:** City of Los Angeles Department of Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once prior to the issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

H. Transportation

(1) Project Design Features

Project Design Feature TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:

- As parking lane and/or sidewalk closures are anticipated, the Worksite Traffic Control Plan, approved by the City of Los Angeles, will route vehicular traffic, bicyclists, and pedestrians around any such closures;
- Ensure that access will remain unobstructed for land uses in proximity to the Project site during construction;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project site; and
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Phase:** Pre-construction; Construction

- **Monitoring Frequency:** Once at plan check; Periodic field inspections
- **Action Indicating Compliance:** Approval of Construction Traffic Management Plan by Los Angeles Department of Transportation prior to issuance of demolition, grading or building permit (Pre-Construction); Plan check approval (Pre-construction); Field inspection sign-off (Construction)

Project Design Feature TR-PDF-2: In order to enhance safety for pedestrians on Jandy Place, during the 60-minute lunch time period between 12:30 P.M. and 1:30 P.M., Monday through Friday, the ingress and egress to the Project site from Jandy Place will be closed, and the only available ingress and egress will be via Beatrice Street.

Within the Project's first year of 80-percent occupancy, the Project will submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the A.M. peak and P.M. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined above. The analysis will be submitted to LADOT for review. If deemed warranted by LADOT, the Project will implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.

- **Enforcement Agency:** City of Los Angeles Department of Transportation, City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Operation
- **Monitoring Frequency:** Once within the Project's first year of 80-percent occupancy; Subsequent monitoring as determined by the City of Los Angeles Department of Transportation
- **Action Indicating Compliance:** Submittal of driveway operational analysis by Project Applicant to LADOT and Los Angeles Department of City Planning; Approval of driveway operational analysis by LADOT sent to Los Angeles Department of City Planning.

(2) Mitigation Measures

Mitigation Measure TR-MM-1: The Project shall prepare a TDM Plan. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the

City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy.

The following TDM elements shall be included in the Project:

- ~~Price Workplace Parking~~—implement workplace parking pricing for employees as specified in the Transportation Assessment.
- ~~Voluntary Travel Behavior Change Program~~—assign a staff person who will serve as the transportation management coordinator for purposes of developing a transportation program and informing Project employees of available travel options.
- Bike parking per LAMC, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel.
- Include secure bike parking, with its own access point, and bike facilities, such as showers and a repair station, to support safe and comfortable bicycle travel by providing end-of-trip amenities.
- ~~Pedestrian Network Improvements~~—provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street.
- ~~Transit Subsidies~~—provide a daily transit subsidy as specified in the Transportation Assessment for every employee who requests the transit subsidy, presents evidence of use of transit, and does not request on-site parking.
- **Enforcement Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning
- **Monitoring Agency:** City of Los Angeles Department of Transportation
- **Monitoring Phase:** Pre-Construction; Post-construction
- **Monitoring Frequency:** Once during plan check; Prior to issuance of a Certificate of Occupancy
- **Action Indicating Compliance:** Once during plan check (Pre-Construction); Approval of TDM plan from City of Los Angeles Department of Transportation and issuance of Certificate of Occupancy (Post-Construction)

I. Utilities and Service Systems —Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: The Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary

by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow are as follows:

- **12,000 gpm fire flow:** Approximately 865 linear feet of 16-inch diameter ductile iron pipe, 600 linear feet of 12-inch ductile iron pipe and 4 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Jandy Place to Grosvenor Boulevard. The new 12-inch pipe will be constructed in Jandy Place from the cul-de-sac end to Beatrice Street, and extend westerly on Beatrice Street approximately 200 linear feet, replacing the existing 8-inch water main in those streets.
- **9,000 gpm fire flow:** Approximately 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe and 2 new fire hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Westlawn Avenue to Grosvenor Boulevard, replacing the existing 8-inch water main. The new 12-inch pipe will be constructed in Beatrice Street from Jandy Place to Westlawn Avenue, replacing the existing 8-inch water main.
- **Enforcement Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety; City of Los Angeles Fire Department
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at plan check; Once during field inspection prior to issuance of Certificate of Occupancy
- **Action Indicating Compliance:** Plan check approval (Pre-construction); Issuance of Certificate of Occupancy (Post-construction)

EXHIBIT E
Beatrice Project EIR PDFs/MMs and 2017 LOD
Conditions of Approval

ENV-2020-3533-EIR

MARCH 13, 2025

Beatrice Project Comparison of 2023 Environmental Impact Report (EIR) measures with 2017 Conditions of Approval

This table compares each 2023 EIR Project Design Features (PDFs) and Mitigation Measures (MMs) identified in the Project’s Mitigation Monitoring Program with any applicable or similar measure identified in the 2017 Conditions of Approval (including Conditions identifying mitigation measures from the 2017 Mitigated Negative Declaration [MND]). As demonstrated below, the 2023 EIR PDFs and MMs do not conflict with any of the 2017 Conditions of Approval. Each PDF, MM, and Condition of Approval will be enforced through the City’s plan check and building permitting process.

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
AESTHETICS		
<p>AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project site to screen construction activity from view at the street level.</p>	<p>RC-PS-9 in the 2017 MND: Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. The perimeter fence shall have gates installed to facilitate the ingress and egress of equipment and the work force. The perimeter and silt fence shall be maintained while in place. Where applicable, the construction fence shall be incorporated with a pedestrian walkway.</p>	<p>Temporary construction fencing was identified as a standard construction practice and as a Regulatory Compliance measure in the MND. AES-PDF-1 substantially conforms to RC-PS-9.</p>
<p>AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash,</p>	<p>None.</p>	<p>While there is no explicit corresponding condition of approval in the 2017 LOD, AES-PDF-2 is a standard City requirement.</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
graffiti, peeling postings and of uniform pain color or graphic treatment) throughout the construction period.		
<p>AES-PDF-3: Outdoor lighting used during construction will be shielded and/or aimed such that the light source cannot be seen from adjacent properties, the public right-of-way, or from above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.</p>	<p>10. Lighting. Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above.</p> <p>22. MM- AES-1. (Light). Outdoor lighting shall be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way.</p>	<p>Limitations to outdoor lighting associated with Project operations were included in the Project's 2017 LOD through Condition Nos. 10 and 22. AES-PDF-3 is a standard construction best practice requirement and substantially conforms to the 2017 LOD.</p>
<p>AES-PDF-4: New on-site electrical utilities that may be required to serve the Project will be installed underground.</p>	<p>None.</p>	<p>AES-PDF-4 is a standard requirement.</p>
<p>AES-PDF-5: All new outdoor lighting required for the Project will be shielded and directed towards the interior of the Project site such that the light source does not project directly upon any adjacent property or the public right-of-way.</p>	<p>See Conditions 10 and 22 above.</p>	<p>AES-PDF-5 is a City requirement and substantially conforms to the 2017 LOD.</p>
<p>AES-PDF-6: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including</p>	<p>23. MM-AES-2. (Glare). The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected</p>	<p>AES-PDF-6 is a standard condition which also implements California Energy Code Section 140.3. Compliance with AES-PDF-6 will meet the performance standards in Condition of Approval No. 23 in addition to the</p>

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<p>Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.</p>	<p>heat. Windows and other glass surfaces would have a transparency higher than 80 percent and be less than 15 percent reflective.</p>	<p>regulatory requirements of Section 140.3 of the California Energy Code.</p>
<p>AES-PDF-7: Above-grade parking will be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.</p>	<p>5. Above-Grade Parking. Above-grade parking shall be fully integrated into the building design utilizing extensive glazing so that it is free of blank walls and open screening, to the satisfaction of the Director or Planning.</p> <p>24. MM-AES-3. (Screening on Parking Garages).</p> <p>a. Exterior screening shall be installed to minimize the spill light from luminaires within open structure buildings from reaching beyond the Project Site. The screening shall also be installed so as to minimize the views and potential glare of headlights of motor vehicles within the garage from beyond the Project Site boundary. Screening measures may include, but are not limited to, shielding attached to the luminaire, building, or site structures.</p> <p>b. This measure would be enforced by the Los Angeles Department of Building and Safety and the Los Angeles Department of City Planning. A plan check would be conducted to ensure compliance. A field inspection would be conducted before the issue of the Certificate of Occupancy. Compliance</p>	<p>AES-PDF-7 contains the exact requirements as Condition No. 5. In addition, MM-AES-3 provides further detail on requirements for screening design which implement AES-PDF-7. AES-PDF-7 substantially conforms to the 2017 LOD.</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
	would be indicated by Approval of Lighting Plans prior to issuance of the applicable building permit.	
<p>AES-PDF-8: The applicant will plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.</p>	<p>6. Green Wall. The applicant shall plant clinging vines along the screening of the parking levels to create a green wall, to the satisfaction of the Director of Planning.</p>	<p>Green screening requirements are provided in Condition No. 6. AES-PDF-8 contains the exact requirements as Condition No. 6 of the 2017 LOD. AES-PDF-9 substantially conforms to the 2017 LOD.</p>
AIR QUALITY		
<p>AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators shall be used during construction.</p>	<p>27. MM-NOISE-1 ... e. The construction contractor shall use on-site power generators that shall either be plug-in electric or solar powered.</p>	<p>Requirements related to on-site power generators for construction were provided in the 2017 LOD as Condition No. 27.e. AIR-PDF-1 contains the exact requirements as Condition No. 27.e of the 2017 LOD. AIR-PDF-1 substantially conforms to the 2017 LOD.</p>
CULTURAL		
<p>MM-CUL-MM-1: A qualified archaeologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with archaeologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the</p>	<p>25. MM-CR-1. (Tribal Monitor). Prior to commencing any ground disturbance activities including excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site, the Applicant, or its successor, shall retain and pay for archeological monitors, determined by the City's Office of Historic</p>	<p>Requirements related to inadvertent archaeology discoveries during construction were provided in the first two paragraphs of the 2017 LOD Condition No. 25. CUL-MM-1 is an updated City requirement regarding archaeological resources that provides further detail to implement Condition No. 25 of the 2017 LOD. CUL-MM-1</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
<p>archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendation of evaluating archaeologist and a copy of the archaeological survey report shall be submitted to South Central Coastal Information Center and the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.</p>	<p>Resources to be qualified to identify subsurface tribal cultural resources. ...</p>	<p>substantially conforms to the 2017 LOD.</p>
<p>GEOLOGY AND SOILS</p>		
<p>GEO-MM-1: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities and the materials being excavated. If paleontological materials are encountered, the</p>	<p>RC CR-2 of the 2017 MND: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the project site. The paleontologist shall determine the location, the time frame, and the extent to</p>	<p>Requirements related to inadvertent discoveries of paleontological resources during construction were a Regulatory Compliance measure in the MND although not explicitly included in the 2017 LOD. GEO-MM-1 is an updated City requirement that is substantially similar and provides further detail on</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
<p>paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.</p>	<p>which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in Public Resources Code Section 21083.2.</p>	<p>implementation of conditions related to the inadvertent discovery of resources. GEO-MM-1 substantially conforms to the 2017 LOD.</p>
<p>GREENHOUSE GAS EMISSIONS</p>		
<p>GHG-PDF-1: The design of the new buildings will incorporate features of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to be capable of meeting the standards of LEED Silver® or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features to support and promote environmental</p>	<p>21. PDF-GHG-1. The proposed project will be designed to incorporate measures that will reduce energy and resource demand, including, but not limited to, solid waste recycling, reduced-flow plumbing fixtures, low-energy appliances, and drought-tolerant landscaping. The CALGreen Code specifies additional measures that may reduce energy and resource demand from the proposed project. The proposed</p>	<p>GHG-reducing requirements of the Green Building Code were provided in Condition No. 21. GHG-PDF-1 is an updated City requirement that implements Condition No. 21. Both measures involve compliance with state and local law. LEED Silver certification required by GHG-PDF-1 will achieve the goals of Condition No. 21.</p>

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<p>sustainability, including but not limited to: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; and water-efficient landscaping.</p>	<p>project would incorporate feasible measures such as reducing baseline water usage by 12 percent, use of gray water or rainwater systems for watering landscaped areas, and compliance with the California Department of Water Resources Model Water Efficient Landscape Ordinance (MWELO).</p>	<p>GHG-PDF-1 substantially conforms to the 2017 LOD.</p>
<p>NOISE</p>		
<p>NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Where feasible, electric construction equipment and/or other noise-reducing best practices will be utilized/implemented near sensitive receptors.</p>	<p>27. MM-NOISE-1</p> <p>a. The construction contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>b. The construction contractor shall ensure that all equipment is properly maintained to prevent additional noise due to worn or improperly maintained parts.</p> <p>16. Construction Noise.</p> <p>b. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.</p> <p>...</p> <p>d. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. On-site power generators shall either be plug-in electric or solar powered, where feasible.</p>	<p>Construction equipment shielding and maintenance requirements were provided in Condition Nos. 16.b, and d and 27.a, and b. NOI-PDF-1 contains the exact requirements as Condition Nos. 16.b and d and 27.a, and b. NOI-PDF-1 substantially conforms to the 2017 LOD.</p>

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<p>NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the acoustic line-of-sight from the equipment to the off-site noise-sensitive receptors.</p>	<p>None. Although noise screening of construction equipment was identified in Condition 27 of the LOD, there was no condition for <i>operational equipment</i>. However, the LAMC includes regulations limiting operational noise of mechanical equipment.</p>	<p>While there is no explicit corresponding condition of approval in the 2017 LOD, NOI-PDF-2 is a component of the screening design for the building that does not conflict with the implementation of any LOD Conditions.</p>
<p>NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.</p> <ul style="list-style-type: none"> • Along the southern property line of the Project site between the construction areas and receptor locations R1 and R3. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor locations R1 and 5-dBA at receptor location R3. • Along the western property line of the Project site between the construction areas and the receptor location R5. The temporary sound barrier shall be designed to provide a 	<p>16. Construction Noise. ... c. Temporary noise barriers shall be used along the property boundaries to block the line-of site between the construction equipment and adjacent land uses.</p>	<p>Temporary sound barriers were provided in the 2017 LOD as Condition No. 16.c. NOI-MM-1 is an updated Project requirement that provides additional details that implement Condition No. 16. Specifically, NOI-MM-1 identifies the location and performance standards of the barriers required by Condition of Approval No. 16. NOI-MM-1 substantially conforms to the 2017 LOD.</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
<p>minimum 15-dBA noise reduction at the ground level of receptor location R5.</p> <ul style="list-style-type: none"> During the office-site improvements construction: Provide a temporary moveable noise barrier between the construction equipment and residences along the south side of Beatrice Street (receptor locations R1 and R3) and along the east side of Grosvenor Boulevard (receptor location R2), where feasible. The temporary noise barrier shall be designed to provide a minimum 10-dBA at receptor location R2, and 5-dBA at receptor location R3. 		
POLICE PROTECTION		
<p>POL-PDF-1: During construction, the Applicant will implement temporary security measures, including security fencing, lighting, locked entry, and regular security patrols during non-construction hours.</p>	None.	While there is no explicit corresponding condition of approval in the 2017 LOD, POL-PDF-1 is a standard requirement.
<p>POL-PDF-2: The Project will include security measures for entry into the building and parking area, including a keycard system.</p>	<p>RC-PS-10: The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a</p>	While there is no explicit corresponding condition of approval in the 2017 LOD, the MND included safety design features coordinated with LAPD as RC-PS-10. POL-PDF-2 is a standard requirement.

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	<p>minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.</p>	
<p>POL-PDF-3: The Project will provide proper lighting of the building and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.</p>	<p>See RC-PS-10 above.</p>	<p>While there is no explicit corresponding condition of approval in the 2017 LOD, the MND included safety design features coordinated with LAPD as RC-PS-10. POL-PDF-3 is a standard requirement.</p>
<p>POL-PDF-4: The Project will provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.</p>	<p>See RC-PS-10 above.</p>	<p>While there is no explicit corresponding condition of approval in the 2017 LOD, the MND included safety design features coordinated with LAPD as RC-PS-10. POL-PDF-4 is a standard requirement.</p>
<p>POL-PDF-5: The Project will design entrances to and exits from the building, open spaces around the</p>	<p>See RC-PS-10 above.</p>	<p>While there is no explicit corresponding condition of approval in the 2017 LOD, the</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
building, and pedestrian walkways to be open and in view of surrounding sites.		MND included safety design features coordinated with LAPD as RC-PS-10. POL-PDF-5 is a standard requirement.
POL-PDF-6: The Applicant will consult with LAPD regarding the incorporation of additional feasible crime prevention features into the building design and operation. Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project site to the LAPD's Pacific Area Commanding Officer that includes access routes and any additional information that might facilitate police response.	See RC-PS-10 above.	While there is no explicit corresponding condition of approval in the 2017 LOD, the MND included safety design features coordinated with LAPD as RC-PS-10. POL-PDF-6 is a standard requirement.
TRANSPORTATION		
TR-PDF-1: Prior to the start of construction, a Construction Traffic Management Plan will be prepared and submitted to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control	30. MM-Transportation/Traffic-3. Construction Impacts. DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak hours.	A Construction Traffic Management Plan was provided in Condition No. 30. Maintenance of pedestrian access around construction was provided in Condition No. 15. TR-PDF-1 incorporates the scope of Condition Nos. 30 and 15 of the 2017 LOD. TR-PDF-1 is a standard city requirement and substantially conforms to the 2017 LOD.

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<p>Plan will include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • As parking lane and/or sidewalk closures are anticipated, the Worksite Traffic Control Plan, approved by the City of Los Angeles, will route vehicular traffic, bicyclists, and pedestrians around any such closures; • Ensure that access will remain unobstructed for land uses in proximity to the Project site during construction; • Parking for construction workers will be provided either on-site or at off-site, off-street locations. Parking shall be prohibited on streets in the vicinity of the Project site; and • Coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project site and neighboring businesses and residences. 	<p>15. Pedestrian Access during Construction.</p> <p>a. Maintain Pedestrian Access. The project applicant shall implement the following:</p> <ul style="list-style-type: none"> • Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. The plan shall maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from workspace and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. • Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. • Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects. • Sidewalks shall remain open during construction until only when it is absolutely required to close or block sidewalk for construction staging. 	

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
	Sidewalk shall be reopened as reasonably feasible taking construction and construction staging into account.	
<p>TR-PDF-2: In order to enhance safety for pedestrians on Jandy Place, during the 60-minute lunch time period between 12:30 p.m. and 1:30 p.m., Monday through Friday, the ingress and egress to the Project site from Jandy Place will be closed, and the only available ingress and egress will be via Beatrice Street.</p> <p>Within the Project's first year of 80-percent occupancy, the Project will submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the a.m. peak and p.m. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined above. The analysis will be submitted to LADOT for review. If deemed warranted by LADOT, the Project will implement additional driveway restrictions and/or make</p>	<p>14.a.i. Jandy Place Driveway Restrictions: In order to enhance safety for pedestrians on Jandy Place, during the 60 minute lunch time period between 12:30 p.m. and 1:30 p.m. Monday through Friday, the ingress and egress to the project from Jandy Place shall be closed, and the only available ingress and egress shall be via Beatrice Street.</p> <p>ii. Further Study of Jandy Place Driveway Restrictions: In connection with the <u>first</u> annual supplemental traffic signal warrant analyses submitted pursuant to Project Requirement C.4 contained in our November 21, 2016 TIA, the project shall also submit an analysis of operations of the Jandy Place driveways to determine if any restrictions should be imposed during the a.m. peak and p.m. peak hours to ensure that project driveway operations do not cause a significant impact to traffic flow on Jandy Place at peak hours. This analysis may also review and recommend changes to the 60-minute lunch time Jandy Place driveway restrictions outlined in Recommendation 1 above. The analysis shall be submitted to DOT for review. If deemed warranted by DOT, the project shall</p>	<p>Jandy Place driveway restrictions and follow-up studies were provided in the 2017 LOD as Condition No. 14. TR-PDF-2 contains the exact requirements as Condition No. 14 of the 2017 LOD. TR-PDF-2 substantially conforms to the 2017 LOD.</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
changes to the lunch time driveway restrictions.	implement additional driveway restrictions and/or make changes to the lunch time driveway restrictions.	
<p>TR-MM-1: The Project shall prepare a TDM Plan. The City of Los Angeles requires that the TDM plan be prepared during construction, with the final TDM plan approved by LADOT prior to the City's issuance of the certificate of occupancy for the Project. Implementation of the TDM plan occurs after building occupancy. The following TDM elements shall be included in the Project:</p> <ul style="list-style-type: none"> • Price Workplace Parking – implement workplace parking pricing for employees as specified in the Transportation Assessment. • Voluntary Travel Behavior Change Program – assign a staff person who will serve as the transportation management coordinator for purposes of developing a transportation program and informing Project employees of available travel options. • Bike parking per LAMC, including short-term and long-term parking facilities, to support safe and comfortable bicycle travel. 	<p>29. MM-Transportation/Traffic-2. Transportation Demand Management Plan and Monitoring (TDMP&MP).</p> <p>a. Pursuant to Section 5G of the CTCSP, and in order to insure full and appropriate redress for potential access /circulation conditions, the applicant shall submit to DOT a Transportation Demand Management (TDM) Plan designed to achieve a progressive average vehicle ridership (AVR) reduction, as determined by DOT. The measurement of actual trips and monitoring shall be conducted using an automated detection and surveillance monitoring system. In addition to providing hourly vehicular count tabulations, the monitoring system shall also be designed in a manner that will permit direct data access to DOT staff. The installation and maintenance of the monitoring system shall be at the Projects expense. The monitoring program shall continue until such time that the Project has shown, for five consecutive years, at a minimum of 80% occupancy, achievement of the progressive AVR reduction. Should the review show that an AVR reduction has not been achieved, the project shall be subject to a penalty</p>	<p>A TDM Program was required in Condition No. 29. TR-MM-1 is an updated Project requirement that provides additional details that implement Condition No. 29. TR-MM-1 substantially conforms to the 2017 LOD.</p>

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
<ul style="list-style-type: none"> • Include secure bike parking, with its own access point, and bike facilities such as showers and a repair station to support safe and comfortable bicycle travel by providing end-of-trip amenities. • Pedestrian Network Improvements – provide pedestrian access points directly to sidewalks on the adjacent streets, including Jandy Place and Beatrice Street. • Transit Subsidies – provide a daily transit subsidy as specified in the Transportation Assessment for every employee who requests the transit subsidy, presents evidence of use of transit, and does not request on-site parking. 	<p>program, to be developed in consultation with LADOT, including an extension of the monitoring review period.</p> <p>A full detailed description of the TDMP, and all subsequent MP reporting, should be prepared by a licensed Traffic Engineer and submitted to DOT for review. The TDMP should be submitted to DOT and the Department of City Planning for review and approval, prior to the issuance of any certificate of occupancy.</p> <p>The TDM Plan should include a variety of measures to reduce single occupant vehicle (SOV) trips by increasing the number of walking, bicycling, carpool, vanpool, and transit trips. The project shall also comply with Section 12.26-J (Ordinance 168,700) of the Los Angeles Municipal Code which requires specific TDM and trip reduction measures. The TDM program should include, but is not limited to, the following strategies:</p> <ul style="list-style-type: none"> • Provide a dedicated shuttle service; • Provide and internal Transportation Management Coordination Program with on-site transportation coordinator; • Implement enhanced pedestrian connections (e.g., improve sidewalks, widen crosswalks adjacent to the project, install wayfinding signage and 	

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
	<p>pedestrian level lighting, etc.);</p> <ul style="list-style-type: none"> • Design the project to ensure a bicycle, pedestrian and transit friendly environment; • Coupled with unbundled parking, provide on-site car share amenities; • Provide rideshare program and support for project employees and tenants; • Allow for subsidized transit passes for eligible project employees and tenants; • Coordinate with DOT to determine if the site would be eligible for one or more of the services to be provided by the future Mobility Hubs program (secure bike parking, bike share kiosks, and car-share parking spaces); • Provide on-site transit routing and schedule information; • Contribute a one-time fixed fee into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the area of the proposed project. Amount of fee to be determined in consultation with DOT and Council District 11 staff. • Guaranteed Ride Home Program <p>To the extent possible, the TDM plan should also include opportunities for coordination with the area adjacent Transportation Management Organizations (TMO's) including Playa Vista and the Howard Hughes Center.</p>	

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
UTILITIES AND SERVICE SYSTEMS- WATER SUPPLY AND INFRASTRUCTURE		
<p>WAT-PDF-1:The Project will replace the existing 8-inch diameter water mains in Beatrice Street and Jandy Place and add fire hydrants in the area to increase fire flow protection based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow as determined necessary by LADWP. The specific improvements based on either a 12,000 gpm fire flow or a 9,000 gpm fire flow are as follows:</p> <p>12,000 gpm fire flow: Approximately 865 linear feet of 16-inch diameter ductile iron pipe, 600 linear feet of 12-inch ductile iron pipe and 4 new hydrants would be installed (8 total fire hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Jandy Place to Grosvenor Boulevard. The new 12-inch pipe will be constructed in Jandy Place from the cul-de-sac end to Beatrice Street and extend westerly on Beatrice Street approximately 200 linear feet, replacing the existing 8-inch water main in those streets.</p> <p>9,000 gpm fire flow: Approximately 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe and 2 new fire hydrants would be installed (8 total fire</p>	None.	The implementation of required fire flow standards will be required in compliance with the LAMC.

2023 EIR PDF/MM	2017 Project Condition of Approval	Analysis
<p>hydrants, including existing, with a flow of 1,500 gpm per hydrant). The new 16-inch pipe will extend in Beatrice Street from Westlawn Avenue to Grosvenor Boulevard, replacing the existing 8-inch water main. The new 12-inch pipe will be constructed in Beatrice Street from Jandy Place to Westlawn Avenue, replacing the existing 8-inch water main.</p>		

INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

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Preliminary Comments on the Final Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119)

Alisha C. Pember <apember@adamsbroadwell.com>

Mon, Mar 3, 2025 at 4:59 PM

To: "cpc@lacity.org" <cpc@lacity.org>, "kathleen.king@lacity.org" <kathleen.king@lacity.org>

Cc: "Aidan P. Marshall" <amarshall@adamsbroadwell.com>

Good afternoon,

Please find attached **Preliminary Comments on the Final Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119)** and **Exhibit A.**

We are also providing a Dropbox link containing supporting references: <https://www.dropbox.com/scl/fo/siukhsr6qfl4vdvty8a7m/ACh0BDVLXXqpP57gHkcGuD4?rlkey=sj7j3giknl8f1bzkz68qp5ilm&st=70zjyr2&dl=0>

A hard copy of our Comments and Exhibit A will go out today via overnight delivery.

If you have any questions, please contact Aidan Marshall.

Thank you.

Alisha Pember

Alisha C. Pember
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 L6929-008acp - New Beatrice FEIR Comments and Exhibit A.pdf

827K

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MARC D. JOSEPH

March 3, 2025

Via Email and Overnight Mail

Attn: Commission President Lawshe and Commissioners
Los Angeles City Planning Commission
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: cpc@lacity.org

Via Email Only

Kathleen King, Planner
Email: Kathleen.king@lacity.org

**Re: Preliminary Comments on the Final Environmental Impact
Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No.
2020120119)**

Dear President Lawshe, Honorable Commissioners, and Ms. King:

We are writing on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (“CREED LA”) to provide preliminary comments on the Final Environmental Impact Report (“FEIR”) prepared by the City of Los Angeles (“City”) for the New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119) (“Project”), proposed by NSB Associates (“Applicant”). The Project is scheduled to be considered by the City Planning Commission (“Commission”) in a public hearing on March 13, 2025.

The Project proposes the demolition of an existing 23,072-square-foot office building and two accessory buildings, totaling 7,188 square feet (“SF”), the retention of an 87,881 SF office building, and the construction of a new, eight-story office building with up to 196,100 SF of office space, and 3,400 SF of ground floor commercial space. The Project would total 199,500 SF of floor area, for a Floor Area Ratio of 1.46:1 and a maximum building height of 135 feet to the top of the parapet. The Project site is located at 12531-12553 West Beatrice Street, 12565-12575 West Beatrice Street, and 5410-5454 South Jandy Place, Los Angeles, CA 90066.

L6929-008acp

CREED LA submitted comments on the Draft EIR (“DEIR”) prepared for the Project on February 20, 2024, identifying potentially significant unmitigated air quality, health risk, and noise impacts.¹ These impacts have not been resolved in the FEIR. We reviewed the FEIR and its technical appendices with the assistance of air quality and public health expert James Clark, Ph.D.²

Based upon our review of the FEIR and supporting documentation, we conclude that the FEIR fails to comply with the requirements of the California Environmental Quality Act (“CEQA”).³ The FEIR states that the City performed a new health risk analysis (“HRA”) which the City claims shows that health risk impacts from exposure emissions of toxic air contaminants (“TACs”) would be less than significant. However, this HRA has not been made available for public review as of the date of this letter. The FEIR’s assertion is therefore unsupported.

Meanwhile, **Dr. Clark prepared an updated HRA which continues to demonstrate that the incremental cancer risk would be 15.4 in 1,000,000 for the maximally exposed residence.**⁴ This is a significant health risk which is not mitigated to less than significant levels by the FEIR’s mitigation measures. The City must require feasible mitigation for this impact, such as use of Tier 4 Final construction equipment, to reduce this impact. The use of Tier 4 Final equipment would also be consistent with General Plan policies.⁵

The FEIR also continues to underestimate air quality, health risk, and noise impacts by failing to include the Project’s water infrastructure improvements in its impact analyses. Although the FEIR includes a new noise mitigation measure in response to CREED LA’s comments on noise impacts from construction of offsite water infrastructure, the measure is currently nonbinding and must be reworded to meet CEQA’s standards. And the FEIR still lacks analysis of other impacts associated with water infrastructure improvements, such as construction equipment and truck emissions, traffic, and other construction-related impacts. As a result of these deficiencies, the FEIR’s conclusions regarding construction impacts are not supported by substantial evidence.

¹ Letter from Adams Broadwell Joseph & Cardozo to City re Comments on the Draft Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119) (February 20, 2024).

² Dr. Clark’s technical comments and curricula vitae are attached hereto as **Exhibit A** (“Clark Comments”)

³ PRC § 21100 et seq.

⁴ Clark Comments, pg. 7.

⁵ See Policies 1.3.1 and 5.3.1 of the City of Los Angeles’ General Plan Air Quality Element.

CREED LA urges the City to address the Project's remaining impacts in a revised and recirculated DEIR.⁶

I. STATEMENT OF INTEREST

CREED LA is an unincorporated association of individuals and labor organizations formed to ensure that the construction of major urban projects in the Los Angeles region proceeds in a manner that minimizes public and worker health and safety risks, avoids or mitigates environmental and public service impacts, and fosters long-term sustainable construction and development opportunities. The association includes the Sheet Metal Workers Local 105, International Brotherhood of Electrical Workers Local 11, Southern California Pipe Trades District Council 16, and District Council of Iron Workers of the State of California, along with their members, their families, and other individuals who live and work in the City of Los Angeles.

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

CREED LA has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

CREED LA supports the development of commercial, mixed use, and medical office projects where properly analyzed and carefully planned to minimize impacts on public health, climate change, and the environment. These projects should avoid adverse impacts to air quality, public health, climate change, noise, and traffic, and must incorporate all feasible mitigation to ensure that any remaining adverse impacts are reduced to the maximum extent feasible.

⁶ We reserve the right to supplement these comments at later hearings on this Project. Gov. Code § 65009(b); Public Resources Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199–1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109, 1121.

Only by maintaining the highest standards can commercial development truly be sustainable.

II. THE FEIR FAILS TO FULLY ANALYZE AND MITIGATE THE PROJECT'S POTENTIALLY SIGNIFICANT IMPACTS

A. The FEIR Still Fails to Disclose and Mitigate Potentially Significant Air Quality and Health Risk Impacts

1. The FEIR Still Fails to Recognize the City's Legal Duty to Analyze Health Risks from Construction and Operational Emissions

CREED LA's previous comments on the DEIR explained that a quantified HRA should be prepared for the Project because CEQA requires that a project's health risks "must be 'clearly identified' and the discussion must include 'relevant specifics' about the environmental changes attributable to the Project and their associated health outcomes."⁷

In response, Response 3-9 states that the City prepared an HRA for the Project's construction and operations and included it in the FEIR.⁸ Response 3-9 states that the HRA is available as Appendix FEIR-2, but the appendix only includes noise calculations. An HRA has not otherwise been made available.⁹

The City also erroneously maintains that the HRA was only conducted for informational purposes, and continues to assert that an HRA need not be prepared.¹⁰ This is incorrect. The FEIR, in Response to Comment 3-9, first argues that no applicable regulations require the Project to prepare an HRA.¹¹ This response ignores that CEQA imposes an independent requirement to disclose a project's potential health risks to a degree of specificity that would allow the public to make the correlation between the project's impacts and adverse effects to human

⁷ *Id.* at 518.

⁸ FEIR, pg. II-22.

⁹ <https://planning.lacity.gov/development-services/eir/new-beatrice-west-project-1> (last accessed March 3, 2025).

¹⁰ FEIR, pg. II-20.

¹¹ *Id.*

health.¹² CREED LA's comments explain that quantification of health risk impacts in an HRA is necessary to adequately disclose this particular Project's impacts.¹³

The FEIR also argues that construction emissions of Diesel Particulate Matter ("DPM") need not be analyzed in an HRA because they occur over a shorter time period than 70 years.¹⁴ This reasoning is erroneous. Individual cancer risk is not just affected by the duration of exposure to TACs, but also the concentration of the individual's unique exposure scenario and the toxicity of the chemical. Accordingly, the Office of Environmental Health Hazard Assessment's ("OEHHA") Risk Assessment Guidelines set a recommended threshold for preparing an HRA of a construction period of two months or more.¹⁵

The FEIR argues that OEHHA guidance is inapplicable to this Project because the "[t]he local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste remediation," and such projects typically would be limited to site remediation.¹⁶ This argument fails because the very quote cited by the FEIR states that the risk assessment guidelines are sometimes used for construction projects. Thus, the FEIR lacks substantial evidence to claim that the risk assessment guidelines are inapplicable to construction projects. The FEIR also ignores that SCAQMD and CARB often recommend construction projects not subject to the Hot Spots program to conduct a construction HRA, per the linked comment letters.¹⁷ The FEIR also ignores that other environmental documents prepared by the City recognize that the OEHHA

¹² *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, 523.

¹³ Letter from Adams Broadwell Joseph & Cardozo to City re Comments on the Draft Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119) (February 20, 2024), pg. 6.

¹⁴ FEIR, pg. II-20

¹⁵ Office of Environmental Health Hazard Assessment ("OEHHA"), Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, February 2015 (OEHHA 2015), Section 8.2.10: Cancer Risk Evaluation of Short Term Projects, pp. 8-17/18; <https://oehha.ca.gov/media/downloads/crnrr/2015guidancemanual.pdf>; <https://oehha.ca.gov/air/crnrr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

¹⁶ FEIR, pg. II-22.

¹⁷ Letter from SCAQMD to City of Los Angeles re: Boyle Heights Community Plan Update (October 11, 2022) ("the Proposed Project's construction health risk impacts may have been underestimated in the Draft EIR... South Coast AQMD staff recommends that the Lead Agency revise the construction HRA"); Letter from CARB to City of Calimesa re: Oak Valley North DEIR (May 1, 2024) <https://ww2.arb.ca.gov/sites/default/files/2024-05/CARB%20Comments%20-%20Oak%20Valley%20North%20DEIR.pdf> ("the cancer risks evaluated in the construction HRA should be based on the latest OEHHA guidance").

guidance is applicable to construction activities.¹⁸ In sum, the FEIR lacks substantial evidence to conclude that a HRA need not be prepared for the Project.

2. The Project Would Result In Potentially Significant Health Risk Impacts

CREED LA attached an HRA prepared by Dr. Clark demonstrating that the Project's construction activities would result in a potentially significant health risk impact. Responses 3-20 to 3-24 argue that the assumptions in Dr. Clark's analysis are incorrect and overly conservative,¹⁹ but Dr. Clark's comment demonstrate that his methodology conforms to industry standards and is intended to be health-protective.²⁰ Dr. Clark updated the HRA to demonstrate that even when the City's preferred methodology is used, the incremental cancer risk would be 15.4 in 1,000,000 for the maximally exposed residence based on the exposure concentration of Diesel Particulate Matter at 0.08254 ug/m³.²¹ This would exceed the 10 in one million cancer risk – significant impact requiring mitigation in a revised DEIR.

3. The Project Conflicts with Applicable Policies Regarding Air Quality and Health Risk

CREED LA's comments on the DEIR explain that the Project is inconsistent with Policies 1.3.1 and 5.3.1 of the City of Los Angeles' General Plan Air Quality Element by not setting minimum emissions standards for construction equipment.²² Policy 1.3.1 of the City of Los Angeles' General Plan Air Quality Element provides: "[m]inimize particulate emissions from construction sites." And Policy 5.3.1 of the Air Quality Element provides: "Support the development and use of equipment powered by electric or low-emitting fuels." Response 3-12 reasons that the Project would be consistent with these policies by complying with fugitive dust regulations

¹⁸ City of Los Angeles, DEIR for the 1020 S Figueroa Street Project, SCH 2016021013, pg. 4.B-26, available at https://planning.lacity.gov/eir/1020SoFigueroa/DEIR/4_B_Air_Quality.pdf ("The greatest potential for TAC emissions during construction would be related to diesel particulate matter emissions associated with heavy-duty equipment during demolition, excavation and grading activities... The OEHHA is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's the Air Toxics Hot Spots Program Risk Assessment (AB 2588) regulation.... The construction HRA was performed in accordance with the revised OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA Guidance).").

¹⁹ FEIR, pg. II-42 to II-53.

²⁰ Clark Comments, pg. 3.

²¹ *Id.* at 7.

²² Letter from Adams Broadwell Joseph & Cardozo to City re Comments on the Draft Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119) (February 20, 2024), pg. 10.

and using electric power from utility poles where available.²³ The response also states that air quality impacts would be less than significant. But Policy 1.3.1 calls for minimization of particulate emissions, not just reduction. CREED LA and Dr. Clark previously commented that Tier 4 construction equipment would further reduce particulate emissions and is commercially available.²⁴ The FEIR does not provide any evidence suggesting Tier 4 equipment would be infeasible for this Project or not reduce particulate emissions. The FEIR must be revised to require use of Tier 4 equipment.

B. The FEIR Still Fails to Analyze and Mitigate Potentially Significant Impacts Resulting from Construction of Water Infrastructure Improvements

CREED LA's comments on the DEIR demonstrate that the DEIR failed to analyze noise, vibration, air quality, and health risk impacts associated with construction of offsite water infrastructure improvements. These impacts remain potentially significant in the FEIR.

The FEIR responds to CREED LA's comments regarding construction noise by adding language to NOI-MM-1 calling for a temporary moveable noise barrier between offsite construction activities and sensitive receptors.²⁵ But the measure states that the barrier would only be used "when feasible."²⁶ The measure should be revised to remove the "when feasible" language, as there is no evidence in the FEIR that acoustic barriers are infeasible. This is necessary to meet CEQA's requirements for adequate mitigation, which require a lead agency adopt all feasible mitigation to reduce significant environmental impacts to the greatest extent feasible.²⁷

²³ FEIR, pg. II-26.

²⁴ Nonroad Compression-Ignition Engines: Exhaust Emission Standards, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100OA05.pdf>; <https://www.cummins.com/news/2021/02/08/emission-regulations-diesel-engines-used-upstream-oil-and-gas-activities>; San Francisco Clean Construction Ordinance Implementation Guide for San Francisco Public Projects." August 2015, available at: https://www.sfdph.org/dph/files/EHSdocs/AirQuality/San_Francisco_Clean_Construction_Ordinance_2015.pdf, pg. 6.

²⁵ FEIR, pg. II-32.

²⁶ *Id.*

²⁷ PRC § 21081(a)(3), (b); CEQA Guidelines §§ 15090, 15091; *Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal.App.5th 867, 883.

Although the FEIR responds to CREED LA's comments on construction noise, the FEIR fails to respond to CREED LA's comments on vibration impacts.²⁸ Off-site construction activities would result in vibration impacts closer to sensitive receptors than analyzed in the DEIR. The potentially significant vibration impacts must be analyzed in a revised and recirculated DEIR.

Response 3-16 claims that the DEIR adequately analyzes air quality impacts from construction of offsite water infrastructure improvements. The response states that emissions from offsite infrastructure construction activities are accounted for because the air quality analysis considers peak-daily construction activities. Dr. Clark reviewed the CalEEMod analysis and observes that nowhere in the model are improvements to the water infrastructure included.²⁹

Response 3-16 further states that construction of off-site infrastructure improvements would not contribute to significant health risk impacts, pointing to the conclusions of the FEIR's HRA. But since the HRA has not been made available for public review, there is no evidence that water infrastructure improvements were included in the analysis.

In sum, the FEIR does not fully address the potentially significant impacts resulting from offsite construction activities. Updated analysis and mitigation must be provided in a recirculated DEIR.

²⁸ Letter from Adams Broadwell Joseph & Cardozo to City re Comments on the Draft Environmental Impact Report for New Beatrice West Project (ENV-2020-3533-EIR; SCH No. 2020120119) (February 20, 2024), pg. 12.

²⁹ Clark Comments, pg. 3.

III. CONCLUSION

As is explained herein, the FEIR's air quality, health risk, and noise analyses remain substantially inaccurate and incomplete, failing to comply with the requirements of CEQA. As a result, the FEIR still fails to adequately disclose and mitigate the Project's significant impacts.

The City cannot approve the Project until the errors and omissions in the FEIR are remedied, and a revised FEIR is recirculated for public review and comment which fully discloses and mitigates the Project's potentially significant environmental and public health impacts. CREED LA urges the City Planning Commission to require the City revise and recirculate the FEIR before any further action is taken on the Project.

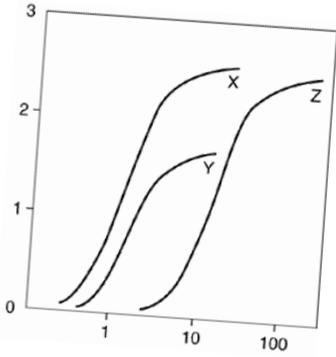
Sincerely,



Aidan P. Marshall

Attachment
APM:acp

EXHIBIT A



February 28, 2025

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

Attn: Mr. Aidan Marshall

**Subject: Response To Comments On New Beatrice West Project,
Draft Environmental Impact Report (DEIR), Case
Number: ENV-2020-3533-EIR**

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At the request of Adams Broadwell Joseph & Cardozo (ABJC), Clark and Associates (Clark) has reviewed materials related to the March 2025 City of Los Angeles (the City) Draft Environmental Impact Report (“DEIR”) of the above referenced project.

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

The Draft EIR prepared for the Project failed to include a health risk analysis quantifying the exposure of nearby residents to toxic air contaminants emitted during Project construction and operation. Clark prepared an HRA to estimate the Project's potential health risk impacts. The Final EIR includes responses to comments stating that Clark's HRA was inaccurate and that the City prepared its own HRA finding less than significant impacts. As will be demonstrated herein, the City's assertion is unsupported and the Project would result in potentially significant health risk impacts.

The City's critiques of the modeling of the construction phase of the Project presented in Clark's comment letter is based on an assumption of an averaged exposure to the nearby residents. While an HRA can be based on the averaged emissions from a site, utilizing the maximum emission rates will provide an upper bound threshold of the risks and will help determine the need for additional mitigation measures at the Site. The City mentions that a construction and operational HRA was prepared based on the California Air Pollution Control Officers Association (CAPCOA) Guidance Document for Health Risk Assessments for Proposed Land Uses Projects.¹ On page 2 of the Guidance it is stated that "This guidance does not include how risk assessments for construction projects should be addressed in CEQA. As this is intended to be a 'living document', the risks near construction projects are expected to be included at a later time as the toxic emissions from construction activities are better quantified." Citing the guidance as a basis for how to model construction risks therefore appears to be a mistake by the City.

The reference in the City's comments that the maximum risk is 1.5 in one million for residents to the south of the Project is also not verifiable since the City did not include the modeling inputs and outputs for independent validation. It must be noted that the maximum risk from the Project emissions will be based on the maximum exposure dose received by a receptor, not the averaged exposure point concentration of the averaged emissions.

As stated above, the analysis presented in the comment letter evaluated the maximum exposure point concentration based on the maximum emission rates from the Project. The variability in the emission rates is substantial. For example, looking at the demolition phase of the Project (in 2024) the maximum emission of DPM from off-road equipment is calculated to be 1.08 lbs per day. The averaged daily rate calculated for the same equipment is 0.06 lbs per day.

¹ CAPCOA. 2009. Health Risk Assessments For Proposed Land Use Projects. Approved for release July 2009.

3.2. Demolition (2024) - Mitigated

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

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.60	23.1	26.3	0.04	1.08	—	1.08	0.99	—	0.99
Demolition	—	—	—	—	—	4.63	4.63	—	0.70	0.70
Onsite truck	0.02	0.57	0.42	< 0.005	< 0.005	0.71	0.71	< 0.005	0.07	0.07
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	1.27	1.44	< 0.005	0.06	—	0.06	0.05	—	0.05
Demolition	—	—	—	—	—	0.25	0.25	—	0.04	0.04
Onsite truck	< 0.005	0.03	0.02	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.23	0.26	< 0.005	0.01	—	0.01	0.01	—	0.01

Figure 1: CalEEMod Output For Demolition Phase From DEIR

This 18-fold difference (maximum is 18 times higher than the averaged rate) is a substantial difference that must be addressed in the analysis. Additionally at the time of the preparation of the DEIR, the Project air quality analysis did not include the additional emissions from the installation of a new water main at the project site. According to the Utility Technical Report of Water Infrastructure For New Beatrice West,² a new 16-inch pipe will need to be extended in Beatrice Street from Jandy Place to Grovenor Boulevard. This would involve the installation of 200 linear feet of pipe. Additionally, to meet the 9,000 gallon per minute (gpm) fire flow the existing water system will require the installation of 550 linear feet of 16-inch diameter ductile iron pipe, 325 linear feet of 12-inch ductile iron pipe, and 2 new fire hydrants. This additional construction activity is not included in the original analysis of the Project. A review of the CalEEMod analysis prepared for the construction of the Project (starting at page 106 of Appendix C to the DEIR) shows 7 phases of work anticipated for the construction phase: demolition, site preparation, grading, foundation/concrete pouring, building construction, paving, and architectural coating. Nowhere in the schedule are improvements to the water infrastructure detailed.

² Appendix M to DEIR. Hall, B. 2022. Utility Technical Report of Water Infrastructure For New Beatrice West. Dated September 22, 2022. Pg 6

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2024	1/28/2024	5.00	20.0	—
Site Preparation	Site Preparation	1/29/2024	2/10/2024	5.00	10.0	—
Grading	Grading	2/11/2024	5/1/2024	5.00	58.0	—
Foundation/Concrete Pour	Building Construction	5/2/2024	7/31/2024	5.00	65.0	—
Building Construction	Building Construction	8/1/2024	6/30/2025	5.00	238	—
Paving	Paving	6/1/2025	6/30/2025	5.00	21.0	—
Architectural Coating	Architectural Coating	4/1/2025	6/30/2025	5.00	65.0	—

Figure 2: Construction Schedule Modeled by City

This same schedule is repeated on Page 148 of Appendix C in the Custom Report of Onsite Construction, demonstrating that the City failed to include this phase of Project construction in its air quality analysis, as required.

By contrast, Clark’s air dispersion modeling and preparation of the HRA was in conformance with general practices within the environmental consulting community. The basic inputs of a pollutant dispersion model include the emission source(s), pollutant emission levels, meteorological data, topography, and atmospheric chemical processes (when possible). In the most commonly used model, a Gaussian dispersion model, the plume of pollution spread is due to the diffusion of the constituent pollutants, Gaussian models take the pollutant concentrations will follow a normal (Gaussian) distribution in both the horizontal and vertical aspects,³ which has been previously established through experimental measurements of plume spread.⁴ Gaussian plume models assume the pollutants are emitted at a continuous rate, and modeling the pollutants as a single, continuous plume (see the figure below). Gaussian plumes expand in two-dimension over time (y and z). Gaussian plume models require the following assumptions: the emission and meteorological conditions must remain constant, no chemical transformations occur, and wind speeds always equal or exceed 1 m s⁻¹.⁵ In plain language, pollutants are released into the environment at a continuous rate and diluted over time and distance from the source in multiple directions.

³ Godish, T.; Davis, W.T.; Fu, J.S. 2014. *Air quality*; CRC Press: Boca Raton, FL, USA.

⁴ Nieuwstadt, F.; van Dop, H. *Atmospheric Turbulence and Air Pollution Modeling*; D. Reidel Publishing Company: Dordrecht, The Netherlands, 1982; p. 358

⁵ Ibid.

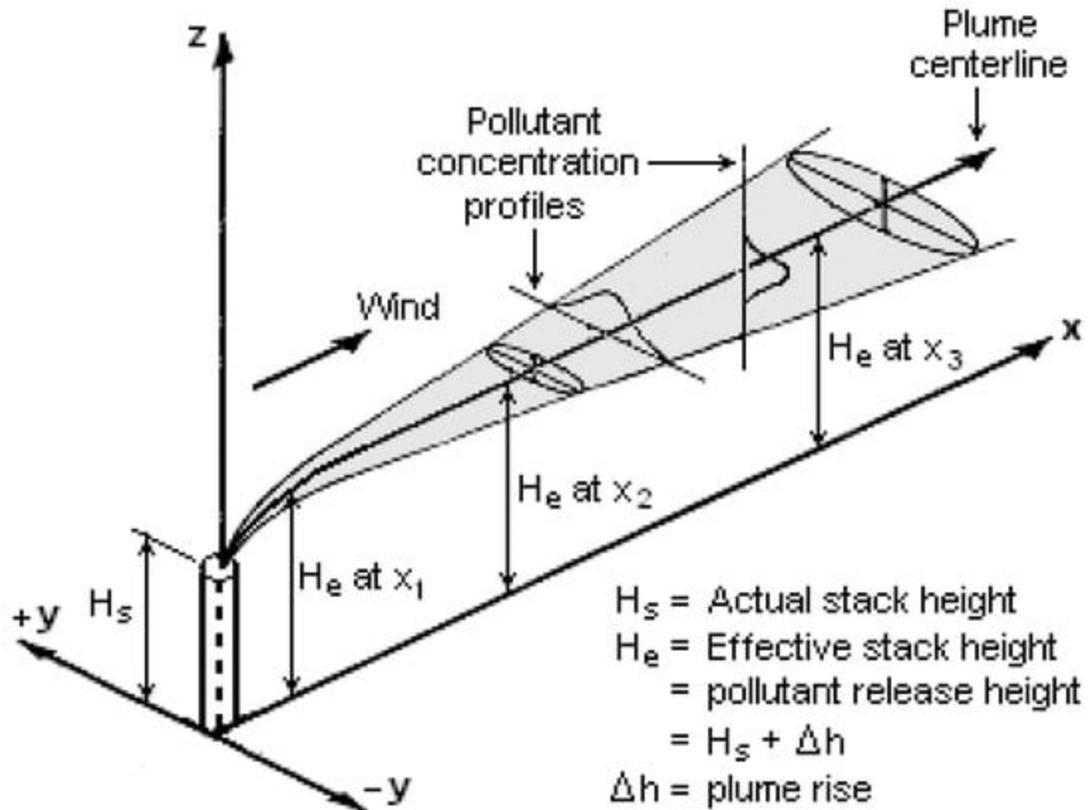


Figure 3: Gaussian Plume

The amount of dispersion is greater the farther away from the source the pollutant travels. Or inversely, the closer the receptor the higher the exposure concentration.

The South Coast Air Quality Management District (SCAQMD) uses a simplified method in the preparation of Risk Assessments for Rules 1401, 1401.1, and 212.⁶ SCAQMD notes that “concentration of a contaminant decreases with distance away from the site of release and spreads out or “dispersed.” χ/Q are numerical estimates of the amount of dispersion that occurs under specific conditions. The amount of dispersion depends on the distance traveled, the height of release, and meteorological conditions such as wind speed and atmospheric stability.” The χ/Q values are referred to as dilution factors in the OEHHA’s 2015 Air Toxics Hot Spots Program Guidance Manual. Tables of χ/Q typically begin with values no less than 25 meters from the source.⁷ For example, Table 7A

⁶ SCAQMD. 2024. Risk Assessment Procedures for Rules 1401, 1401.1, and 212. Version 9.0 Dated October 31, 2024 pg 6

⁷ SCAQMD. 2017. Tier 1/Tier 2 Screening Risk Assessment Procedure Software.

from the SCAQMD’s software shows that the dispersion factor for a volume source operating less than 12 hours per day is significantly greater (reduces the concentration at a receptor by a much greater rate [a factor of more than 700]) for sources 1,000 meters compared to a source 25 meters or less away from a source.

Table 7A - Volume source, operating less than or equal to 12 hrs/day ($\mu\text{g}/\text{m}^3$)/(tons/yr)

Source Dimensions		Downwind Distance (meters)							
Area (ft^2)	Height (ft)	25	50	75	100	200	300	500	1,000
Area \leq 3,000	\leq 20	7.23	2.28	1.24	0.80	0.25	0.12	0.04	0.01
3,000 < Area \leq 10,000	\leq 20	4.84	1.87	1.09	0.72	0.24	0.11	0.04	0.01
10,000 < Area \leq 30,000	\leq 20	4.85	2.06	1.17	0.76	0.24	0.11	0.04	0.01

Given the distance from the source to the receptors (less than 25 meters from the edge of the Project Site to the closest receptor), little or no dispersion will occur before the receptors are impacted by the DPM emissions.

Using a maximal exposure risk model is therefore more health protective than the averaged approach assumed by the City. It also allows for the analysis of maximal short-term exposures (acute exposures) of the receptors. For the model used in my comment letter, the total mass of DPM emitted from the Project Site was held constant. To determine the emission rate the mass was divided by the area of the Project Site. Since the mass is constant the use of a larger surface area would drive the emission rate down not up as the City claims. Whether using a volume source or an area source; or setting the system to incorporate urban versus rural there is no impact on the model output since the distance between the receptors and sources are so small (see χ/Q discussion above). Only changing the value of the source term will impact the results of the model. The results of running the model as a volume source and as an area source (more representative of the actual working conditions at the site are included as an appendix to this letter).

I reran the model to address the City’s concern that my original model did not disclose the emission limitation. Re-running the air dispersion model as an area source (attached as appendix) to include only the 8-hour emission schedule, I have calculated a maximum annual ground level concentration of DPM of $0.08254 \text{ ug}/\text{m}^3$ and an annual average ground level concentration of DPM of $0.01691 \text{ ug}/\text{m}^3$ over the modeling domain. The maximum 1-hour concentration of DPM in the modeling domain (all of the residences south of the Project) are all in excess of $5 \text{ ug}/\text{m}^3$, the reference

concentration of DPM cited in the DEIR by the City. The maximum 1-hour value is 12.12 ug/m³, more than double the reference concentration.

Re-running the air dispersion model as volume source (attached as appendix) to include only the 8-hour emission schedule, I have calculated a maximum annual ground level concentration of DPM of 0.06648 ug/m³ and an annual average ground level concentration of DPM of 0.0219 ug/m³ over the modeling domain. The maximum 1-hour concentration of DPM in the modeling domain (all of the residences south of the Project) are all in excess of 5 ug/m³, the reference concentration of DPM cited in the DEIR by the City. The maximum 1-hour value is 15.69 ug/m³, more than triple the reference concentration.

Using the standard equations below from OEHHA and the default exposure factors associated with a residential scenario (listed in the table below), I calculated a cancer risk of 15.4 in 1,000,000 for the maximally exposed residence based on the exposure concentration of DPM at 0.08254 ug/m³. The average risk for residents across the street from the Project is 3.7 in 1,000,000 based on the exposure concentration of DPM at 0.01691 ug/m³.

$$Risk_{inh} = Dose_{air} * CPF * ASF * ED/AT$$

$$Dose_{air} = C_{air} * \{BR/BW\} * A * EF * 10^{-6}$$

Age Group	Risk	Age Sensitivity	FAH	ED	CPF	Dose Air	Cair	BR/BW	A	EF
3rd Trimester	9.54E-07	10	1	0.25	1.1	2.85E-05	0.08254	361	1	0.958904
0-2	1.44E-05	10	1	1.25	1.1	8.62E-05	0.08254	1090	1	0.958904
Total	15.4E-06									

It is clear from the analysis above that the risk remains in excess of the SCAQMD risk threshold level, resulting in a significant unmitigated impact.

Conclusion

Given the wide variance in the emission rates of DPM from the Project Site it is clear that the City must prepare a revised environmental impact report to address the issue of construction emissions.

Sincerely,

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


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1  ** BREEZE AERMOD
2  ** Trinity Consultants
3  ** VERSION 11.0
4
5  CO STARTING
6  CO TITLEONE New Beatrice Center
7  CO TITLETWO DPM From Construction
8  CO MODELOPT DFAULT CONC NODRYDPLT NOWETDPLT
9  CO RUNORNOT RUN
10 CO AVERTIME 1 ANNUAL
11 CO URBANOPT 1887 AREA1 1
12 CO POLLUTID DPM
13 CO FINISHED
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15 SO STARTING
16 SO ELEVUNIT METERS
17 SO LOCATION CSSLLH000 AREAPOLY 369312.7 3761087.8 0
18 ** SRCDESCR Polygon Construction
19 SO SRCPARAM CSSLLH000 7.68173E-07 4.3 7 2.15
20 SO AREAVERT CSSLLH000 369312.7 3761087.8 369359.9 3760992.5 369216.4 3760915.7
369208.8 3760923.4
21 SO AREAVERT CSSLLH000 369172.6 3760996.8 369177.8 3761020.1 369312.7 3761087.8
22 SO URBANSRC CSSLLH000
23 SO EMISFACT CSSLLH000 HRDOW 0 0 0 0 0 0 0 0 0 1 1 1 1 0 1 1 1 1 0 0 0
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24 SO EMISFACT CSSLLH000 HRDOW 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
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26 SO SRCGROUP ALL
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31 RE ELEVUNIT METERS
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34 RE DISCCART 369208.0 3760779.5 4.27 4.27
35 ** RCPDESCR closest receptors
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253	** RCPDESCR	closest	receptors		
254	RE DISCCART	369298.0	3760869.5	4.27	4.27
255	** RCPDESCR	closest	receptors		
256	RE DISCCART	369308.0	3760869.5	4.27	4.27
257	** RCPDESCR	closest	receptors		
258	RE DISCCART	369318.0	3760869.5	4.27	4.27
259	** RCPDESCR	closest	receptors		
260	RE DISCCART	369328.0	3760869.5	4.27	4.27
261	** RCPDESCR	closest	receptors		

262	RE DISCCART	369198.0	3760879.5	4.27	4.27
263	** RCPDESCR	closest	receptors		
264	RE DISCCART	369208.0	3760879.5	4.27	4.27
265	** RCPDESCR	closest	receptors		
266	RE DISCCART	369218.0	3760879.5	4.27	4.27
267	** RCPDESCR	closest	receptors		
268	RE DISCCART	369228.0	3760879.5	4.27	4.27
269	** RCPDESCR	closest	receptors		
270	RE DISCCART	369238.0	3760879.5	4.27	4.27
271	** RCPDESCR	closest	receptors		
272	RE DISCCART	369248.0	3760879.5	4.27	4.27
273	** RCPDESCR	closest	receptors		
274	RE DISCCART	369258.0	3760879.5	4.27	4.27
275	** RCPDESCR	closest	receptors		
276	RE DISCCART	369268.0	3760879.5	4.27	4.27
277	** RCPDESCR	closest	receptors		
278	RE DISCCART	369278.0	3760879.5	4.27	4.27
279	** RCPDESCR	closest	receptors		
280	RE DISCCART	369288.0	3760879.5	4.27	4.27
281	** RCPDESCR	closest	receptors		
282	RE DISCCART	369298.0	3760879.5	4.27	4.27
283	** RCPDESCR	closest	receptors		
284	RE DISCCART	369308.0	3760879.5	4.27	4.27
285	** RCPDESCR	closest	receptors		
286	RE DISCCART	369318.0	3760879.5	4.27	4.27
287	** RCPDESCR	closest	receptors		
288	RE DISCCART	369218.0	3760889.5	4.27	4.27
289	** RCPDESCR	closest	receptors		
290	RE DISCCART	369228.0	3760889.5	4.27	4.27
291	** RCPDESCR	closest	receptors		
292	RE DISCCART	369238.0	3760889.5	4.27	4.27
293	** RCPDESCR	closest	receptors		
294	RE DISCCART	369248.0	3760889.5	4.27	4.27
295	** RCPDESCR	closest	receptors		
296	RE DISCCART	369258.0	3760889.5	4.27	4.27
297	** RCPDESCR	closest	receptors		
298	RE DISCCART	369268.0	3760889.5	4.27	4.27
299	** RCPDESCR	closest	receptors		
300	RE DISCCART	369278.0	3760889.5	4.27	4.27
301	** RCPDESCR	closest	receptors		
302	RE DISCCART	369288.0	3760889.5	4.27	4.27
303	** RCPDESCR	closest	receptors		
304	RE DISCCART	369298.0	3760889.5	4.27	4.27
305	** RCPDESCR	closest	receptors		
306	RE DISCCART	369308.0	3760889.5	4.27	4.27
307	** RCPDESCR	closest	receptors		
308	RE DISCCART	369318.0	3760889.5	4.27	4.27
309	** RCPDESCR	closest	receptors		
310	RE DISCCART	369238.0	3760899.5	4.27	4.27
311	** RCPDESCR	closest	receptors		
312	RE DISCCART	369248.0	3760899.5	4.27	4.27
313	** RCPDESCR	closest	receptors		
314	RE DISCCART	369258.0	3760899.5	4.27	4.27
315	** RCPDESCR	closest	receptors		
316	RE DISCCART	369268.0	3760899.5	4.27	4.27
317	** RCPDESCR	closest	receptors		
318	RE DISCCART	369278.0	3760899.5	4.27	4.27
319	** RCPDESCR	closest	receptors		
320	RE DISCCART	369288.0	3760899.5	4.27	4.27
321	** RCPDESCR	closest	receptors		
322	RE DISCCART	369298.0	3760899.5	4.27	4.27
323	** RCPDESCR	closest	receptors		
324	RE DISCCART	369308.0	3760899.5	4.27	4.27
325	** RCPDESCR	closest	receptors		
326	RE DISCCART	369248.0	3760909.5	4.27	4.27
327	** RCPDESCR	closest	receptors		

328 RE DISCCART 369258.0 3760909.5 4.27 4.27
329 ** RCPDESCR closest receptors
330 RE DISCCART 369268.0 3760909.5 4.27 4.27
331 ** RCPDESCR closest receptors
332 RE DISCCART 369278.0 3760909.5 4.27 4.27
333 ** RCPDESCR closest receptors
334 RE DISCCART 369288.0 3760909.5 4.27 4.27
335 ** RCPDESCR closest receptors
336 RE DISCCART 369298.0 3760909.5 4.27 4.27
337 ** RCPDESCR closest receptors
338 RE DISCCART 369308.0 3760909.5 4.27 4.27
339 ** RCPDESCR closest receptors
340 RE DISCCART 369268.0 3760919.5 4.27 4.27
341 ** RCPDESCR closest receptors
342 RE DISCCART 369278.0 3760919.5 4.27 4.27
343 ** RCPDESCR closest receptors
344 RE DISCCART 369288.0 3760919.5 4.27 4.27
345 ** RCPDESCR closest receptors
346 RE DISCCART 369298.0 3760919.5 4.27 4.27
347 ** RCPDESCR closest receptors
348 RE DISCCART 369288.0 3760929.5 4.27 4.27
349 ** RCPDESCR closest receptors
350 RE DISCCART 369298.0 3760929.5 4.27 4.27
351 ** RCPDESCR closest receptors
352 RE FINISHED

353
354 ME STARTING
355 ME SURFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.SFC"
356 ** SURFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.SFC"
357 ME PROFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.PFL"
358 ** PROFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.PFL"
359 ME SURFDATA 23174 2012
360 ME UAIRDATA 3190 2012
361 ME PROFBASE 30 METERS
362 ME FINISHED

363
364 OU STARTING
365 OU RECTABLE 1 FIRST
366 OU FILEFORM FIX
367 OU PLOTFILE 1 ALL FIRST ALL`1`FIRST.plt 10000
368 OU PLOTFILE 1 CON FIRST CON`1`FIRST.plt 10001
369 OU PLOTFILE ANNUAL ALL ALL`ANNUAL.plt 10002
370 OU PLOTFILE ANNUAL CON CON`ANNUAL.plt 10003
371 OU FINISHED

372
373
374 *** Message Summary For AERMOD Model Setup ***

375
376 ----- Summary of Total Messages -----
377

378 A Total of 0 Fatal Error Message(s)
379 A Total of 7 Warning Message(s)
380 A Total of 0 Informational Message(s)

381
382
383 ***** FATAL ERROR MESSAGES *****
384 *** NONE ***
385

386
387 ***** WARNING MESSAGES *****
388 CO W320 11 URBOPT: Input Parameter May Be Out-of-Range for Parameter
URB-POP
389 ME W186 362 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold
used 0.50
390 ME W187 362 MEOPEN: ADJ_U* Option for Stable Low Winds used in
AERMET

391 OU W565 367 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
392 OU W565 368 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
393 OU W565 369 PERPLT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
394 OU W565 370 PERPLT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE

395
396 *****
397 *** SETUP Finishes Successfully ***
398 *****
399

400 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
401 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09
402

PAGE 1
403 *** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
404
405 *** MODEL SETUP OPTIONS SUMMARY ***
406 - - - - -

407
408 ** Model Options Selected:
409 * Model Uses Regulatory DEFAULT Options
410 * Model Is Setup For Calculation of Average CONCentration Values.
411 * NO GAS DEPOSITION Data Provided.
412 * NO PARTICLE DEPOSITION Data Provided.
413 * Model Uses NO DRY DEPLETION. DDPLETE = F
414 * Model Uses NO WET DEPLETION. WETDPLT = F
415 * Stack-tip Downwash.
416 * Model Accounts for ELEVated Terrain Effects.
417 * Use Calms Processing Routine.
418 * Use Missing Data Processing Routine.
419 * No Exponential Decay.
420 * Model Uses URBAN Dispersion Algorithm for the SBL for 1 Source(s),
421 for Total of 1 Urban Area(s):
422 Urban Population = 1887.0 ; Urban Roughness Length = 1.000 m
423 * Urban Roughness Length of 1.0 Meter Used.
424 * ADJ_U* - Use ADJ_U* option for SBL in AERMET
425 * CCVR_Sub - Meteorological data includes CCVR substitutions
426 * TEMP_Sub - Meteorological data includes TEMP substitutions
427 * Model Assumes No FLAGPOLE Receptor Heights.
428 * The User Specified a Pollutant Type of: DPM
429
430 **Model Calculates 1 Short Term Average(s) of: 1-HR
431 and Calculates ANNUAL Averages
432
433 **This Run Includes: 1 Source(s); 2 Source Group(s); and 160 Receptor(s)
434
435 with: 0 POINT(s), including
436 0 POINTCAP(s) and 0 POINTHOR(s)
437 and: 0 VOLUME source(s)
438 and: 1 AREA type source(s)
439 and: 0 LINE source(s)
440 and: 0 RLINE/RLINEXT source(s)
441 and: 0 OPENPIT source(s)
442 and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
443 and: 0 SWPOINT source(s)
444
445
446 **Model Set To Continue RUNning After the Setup Testing.
447
448 **The AERMET Input Meteorological Data Version Date: 16216

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449
450 **Output Options Selected:
451     Model Outputs Tables of ANNUAL Averages by Receptor
452     Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE
         Keyword)
453     Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
454
455 **NOTE:  The Following Flags May Appear Following CONC Values:  c for Calm Hours
456                                                         m for Missing Hours
457                                                         b for Both Calm and
                                                         Missing Hours
458
459 **Misc. Inputs:  Base Elev. for Pot. Temp. Profile (m MSL) =   30.00 ;  Decay Coef.
=   0.000      ;  Rot. Angle =   0.0
460     Emission Units = GRAMS/SEC                               ;  Emission
461     Rate Unit Factor =  0.10000E+07
462     Output Units   = MICROGRAMS/M**3
463
464 **Approximate Storage Requirements of Model =   3.5 MB of RAM.
465
466 **Input Runstream File:
aermod.inp
467
468 **Output Print File:
aermod.out
469
470
471 *** AERMOD - VERSION 22112 ***      *** New Beatrice
Center ***                          02/26/25
472
473 *** AERMET - VERSION 16216 ***      *** DPM From
Construction ***                    20:55:09
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495

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PAGE 2

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*** MODELOPTs:  RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

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*** AREAPOLY SOURCE DATA ***

SOURCE	NUMBER	EMISSION	RATE	LOCATION	OF AREA	BASE	RELEASE	NUMBER
SZ	INIT.	URBAN	EMISSION	X	Y	ELEV.	HEIGHT	OF VERTS.
ID	PART.	(GRAMS/SEC		(METERS)	(METERS)	(METERS)	(METERS)	
(METERS)	CATS.	/METER**2)						
		BY						
CSLLH000	0	0.76817E-06		369312.7	3761087.8	0.0	4.30	7
2.15	YES	HRDOW						

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*** MODELOPTs:  RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

```

*** SOURCE IDs DEFINING SOURCE GROUPS ***

SRCGROUP ID	SOURCE IDs
-----	-----
ALL	CSLLH000 ,

```

496 CON CSLLH000 ,
497 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
498 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09
499
PAGE 4
500 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
501
502
503 *** SOURCE IDs DEFINED AS URBAN SOURCES ***
504
505 URBAN ID URBAN POP SOURCE IDs
506 -----
507
508
509 1887. CSLLH000 ,
510 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
511 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09
512
PAGE 5
513 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
514
515 * SOURCE EMISSION RATE SCALARS WHICH VARY DIURNALLY AND BY DAY OF
WEEK (HRDOW) *
516
SOURCE ID = CSLLH000 ; SOURCE TYPE = AREAPOLY :
517
518 HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR SCALAR HOUR
SCALAR HOUR SCALAR HOUR SCALAR
519 - - - - -
520 DAY OF WEEK = WEEKDAY
521 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6
.0000E+00 7 .0000E+00 8 .1000E+01
522 9 .1000E+01 10 .1000E+01 11 .1000E+01 12 .0000E+00 13 .1000E+01 14
.1000E+01 15 .1000E+01 16 .1000E+01
523 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22
.0000E+00 23 .0000E+00 24 .0000E+00
524 DAY OF WEEK = SATURDAY
525 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6
.0000E+00 7 .0000E+00 8 .0000E+00
526 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14
.0000E+00 15 .0000E+00 16 .0000E+00
527 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22
.0000E+00 23 .0000E+00 24 .0000E+00
528 DAY OF WEEK = SUNDAY
529 1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6
.0000E+00 7 .0000E+00 8 .0000E+00
530 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14
.0000E+00 15 .0000E+00 16 .0000E+00
531 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22
.0000E+00 23 .0000E+00 24 .0000E+00
532 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
533 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09
534
PAGE 6
535 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
536
537 *** DISCRETE CARTESIAN RECEPTORS ***
538 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
539 (METERS)
540

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586 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
587 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09

588
PAGE 7
589 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
590
591 *** DISCRETE CARTESIAN RECEPTORS ***
592 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
593 (METERS)
594

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3760869.5, 4.3, 4.3, 0.0);
605 (369288.0, 3760869.5, 4.3, 4.3, 0.0); (369298.0,
3760869.5, 4.3, 4.3, 0.0);
606 (369308.0, 3760869.5, 4.3, 4.3, 0.0); (369318.0,
3760869.5, 4.3, 4.3, 0.0);
607 (369328.0, 3760869.5, 4.3, 4.3, 0.0); (369198.0,
3760879.5, 4.3, 4.3, 0.0);
608 (369208.0, 3760879.5, 4.3, 4.3, 0.0); (369218.0,
3760879.5, 4.3, 4.3, 0.0);
609 (369228.0, 3760879.5, 4.3, 4.3, 0.0); (369238.0,
3760879.5, 4.3, 4.3, 0.0);

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610      ( 369248.0, 3760879.5,      4.3,      4.3,      0.0);      ( 369258.0,
3760879.5,      4.3,      4.3,      0.0);
611      ( 369268.0, 3760879.5,      4.3,      4.3,      0.0);      ( 369278.0,
3760879.5,      4.3,      4.3,      0.0);
612      ( 369288.0, 3760879.5,      4.3,      4.3,      0.0);      ( 369298.0,
3760879.5,      4.3,      4.3,      0.0);
613      ( 369308.0, 3760879.5,      4.3,      4.3,      0.0);      ( 369318.0,
3760879.5,      4.3,      4.3,      0.0);
614      ( 369218.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369228.0,
3760889.5,      4.3,      4.3,      0.0);
615      ( 369238.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369248.0,
3760889.5,      4.3,      4.3,      0.0);
616      ( 369258.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369268.0,
3760889.5,      4.3,      4.3,      0.0);
617      ( 369278.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369288.0,
3760889.5,      4.3,      4.3,      0.0);
618      ( 369298.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369308.0,
3760889.5,      4.3,      4.3,      0.0);
619      ( 369318.0, 3760889.5,      4.3,      4.3,      0.0);      ( 369238.0,
3760899.5,      4.3,      4.3,      0.0);
620      ( 369248.0, 3760899.5,      4.3,      4.3,      0.0);      ( 369258.0,
3760899.5,      4.3,      4.3,      0.0);
621      ( 369268.0, 3760899.5,      4.3,      4.3,      0.0);      ( 369278.0,
3760899.5,      4.3,      4.3,      0.0);
622      ( 369288.0, 3760899.5,      4.3,      4.3,      0.0);      ( 369298.0,
3760899.5,      4.3,      4.3,      0.0);
623      ( 369308.0, 3760899.5,      4.3,      4.3,      0.0);      ( 369248.0,
3760909.5,      4.3,      4.3,      0.0);
624      ( 369258.0, 3760909.5,      4.3,      4.3,      0.0);      ( 369268.0,
3760909.5,      4.3,      4.3,      0.0);
625      ( 369278.0, 3760909.5,      4.3,      4.3,      0.0);      ( 369288.0,
3760909.5,      4.3,      4.3,      0.0);
626      ( 369298.0, 3760909.5,      4.3,      4.3,      0.0);      ( 369308.0,
3760909.5,      4.3,      4.3,      0.0);
627      ( 369268.0, 3760919.5,      4.3,      4.3,      0.0);      ( 369278.0,
3760919.5,      4.3,      4.3,      0.0);
628      ( 369288.0, 3760919.5,      4.3,      4.3,      0.0);      ( 369298.0,
3760919.5,      4.3,      4.3,      0.0);
629      ( 369288.0, 3760929.5,      4.3,      4.3,      0.0);      ( 369298.0,
3760929.5,      4.3,      4.3,      0.0);

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630 *** AERMOD - VERSION 22112 *** *** New Beatrice *** 02/26/25
Center

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631 *** AERMET - VERSION 16216 *** *** DPM From *** 20:55:09
Construction

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632
633 *** MODELOPTs:      RegDFAULT      PAGE      8
634 CONC      ELEV      NODRYDPLT      NOWETDPLT      URBAN      ADJ_U*
635

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*** METEOROLOGICAL DAYS SELECTED FOR
PROCESSING ***

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(1=YES; 0=NO)

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```

636
637
638      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
639      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
640      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
641      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
642      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
643      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1
644      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1 1 1 1 1 1      1 1 1 1 1
1 1 1 1 1      1 1 1 1 1 1 1 1 1 1

```


684	12	01	01	1	12	186.3	0.227	1.521	0.005	680.	260.	-5.7	0.10	2.55	0.20
	1.86	63.	10.1	299.2	2.0										
685	12	01	01	1	13	190.2	0.253	1.817	0.005	1136.	306.	-7.7	0.10	2.55	0.20
	2.16	300.	10.1	296.4	2.0										
686	12	01	01	1	14	160.2	0.448	1.842	0.005	1405.	720.	-50.6	0.10	2.55	0.21
	4.68	276.	10.1	291.4	2.0										
687	12	01	01	1	15	108.6	0.466	1.661	0.005	1520.	764.	-83.9	0.10	2.55	0.24
	5.02	270.	10.1	289.9	2.0										
688	12	01	01	1	16	37.3	0.455	1.167	0.005	1543.	737.	-228.8	0.10	2.55	0.33
	5.10	270.	10.1	288.1	2.0										
689	12	01	01	1	17	-31.4	0.381	-9.000	-9.000	-999.	569.	159.8	0.10	2.55	0.59
	4.54	268.	10.1	287.5	2.0										
690	12	01	01	1	18	-36.0	0.365	-9.000	-9.000	-999.	529.	146.4	0.10	2.55	1.00
	4.37	274.	10.1	286.4	2.0										
691	12	01	01	1	19	-29.6	0.301	-9.000	-9.000	-999.	398.	99.5	0.10	2.55	1.00
	3.63	271.	10.1	286.4	2.0										
692	12	01	01	1	20	-21.0	0.213	-9.000	-9.000	-999.	239.	49.9	0.10	2.55	1.00
	2.61	271.	10.1	286.4	2.0										
693	12	01	01	1	21	-10.3	0.140	-9.000	-9.000	-999.	128.	24.0	0.10	2.55	1.00
	1.77	281.	10.1	286.4	2.0										
694	12	01	01	1	22	-22.9	0.230	-9.000	-9.000	-999.	265.	58.3	0.10	2.55	1.00
	2.81	270.	10.1	285.9	2.0										
695	12	01	01	1	23	-37.0	0.374	-9.000	-9.000	-999.	550.	154.2	0.10	2.55	1.00
	4.48	272.	10.1	285.9	2.0										
696	12	01	01	1	24	-24.0	0.243	-9.000	-9.000	-999.	299.	65.0	0.10	2.55	1.00
	2.96	274.	10.1	285.9	2.0										

697
698

699 First hour of profile data

700	YR	MO	DY	HR	HEIGHT	F	WDIR	WSPD	AMB_TMP	sigmaA	sigmaW	sigmaV
701	12	01	01	01	10.1	1	246.	1.35	282.6	99.0	-99.00	-99.00

702
703 F indicates top of profile (=1) or below (=0)

704 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
705 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09

706
707 PAGE 10
708 *** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
709 *** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5
YEARS FOR SOURCE GROUP: ALL ***
710 INCLUDING SOURCE(S): CSLH000 ,
711 *** DISCRETE CARTESIAN RECEPTOR POINTS ***
712
713
714 ** CONC OF DPM IN **
MICROGRAMS/M**3 **
715
716 X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD
(M) CONC
717 - - - - -
718 369198.00 3760779.50 0.00694 369208.00
3760779.50 0.00667
719 369198.00 3760789.50 0.00771 369208.00
3760789.50 0.00740
720 369218.00 3760789.50 0.00706 369228.00
3760789.50 0.00670
721 369188.00 3760799.50 0.00892 369198.00
3760799.50 0.00861
722 369208.00 3760799.50 0.00826 369218.00
3760799.50 0.00787
723 369228.00 3760799.50 0.00747 369238.00
3760799.50 0.00706

724	369248.00	3760799.50	0.00665	369188.00
	3760809.50	0.01003		
725	369198.00	3760809.50	0.00968	369208.00
	3760809.50	0.00928		
726	369218.00	3760809.50	0.00884	369228.00
	3760809.50	0.00837		
727	369238.00	3760809.50	0.00790	369248.00
	3760809.50	0.00743		
728	369258.00	3760809.50	0.00697	369268.00
	3760809.50	0.00653		
729	369178.00	3760819.50	0.01168	369188.00
	3760819.50	0.01136		
730	369198.00	3760819.50	0.01097	369208.00
	3760819.50	0.01051		
731	369218.00	3760819.50	0.01000	369228.00
	3760819.50	0.00946		
732	369238.00	3760819.50	0.00891	369248.00
	3760819.50	0.00837		
733	369258.00	3760819.50	0.00784	369268.00
	3760819.50	0.00733		
734	369278.00	3760819.50	0.00685	369288.00
	3760819.50	0.00639		
735	369178.00	3760829.50	0.01332	369188.00
	3760829.50	0.01298		
736	369198.00	3760829.50	0.01253	369208.00
	3760829.50	0.01200		
737	369218.00	3760829.50	0.01140	369228.00
	3760829.50	0.01077		
738	369238.00	3760829.50	0.01013	369248.00
	3760829.50	0.00949		
739	369258.00	3760829.50	0.00888	369268.00
	3760829.50	0.00829		
740	369278.00	3760829.50	0.00772	369288.00
	3760829.50	0.00719		
741	369298.00	3760829.50	0.00669	369308.00
	3760829.50	0.00622		
742	369178.00	3760839.50	0.01532	369188.00
	3760839.50	0.01495		
743	369198.00	3760839.50	0.01445	369208.00
	3760839.50	0.01383		
744	369218.00	3760839.50	0.01313	369228.00
	3760839.50	0.01238		
745	369238.00	3760839.50	0.01162	369248.00
	3760839.50	0.01087		
746	369258.00	3760839.50	0.01014	369268.00
	3760839.50	0.00944		
747	369278.00	3760839.50	0.00878	369288.00
	3760839.50	0.00815		
748	369298.00	3760839.50	0.00756	369308.00
	3760839.50	0.00701		
749	369318.00	3760839.50	0.00652	369328.00
	3760839.50	0.00608		
750	369168.00	3760849.50	0.01796	369178.00
	3760849.50	0.01778		
751	369188.00	3760849.50	0.01741	369198.00
	3760849.50	0.01685		
752	369208.00	3760849.50	0.01613	369218.00
	3760849.50	0.01529		
753	369228.00	3760849.50	0.01438	369238.00
	3760849.50	0.01347		
754	369248.00	3760849.50	0.01257	369258.00
	3760849.50	0.01170		
755	369268.00	3760849.50	0.01086	369278.00
	3760849.50	0.01006		
756	369288.00	3760849.50	0.00931	369298.00
	3760849.50	0.00862		

757 369308.00 3760849.50 0.00798 369318.00
 3760849.50 0.00740
 758 *** AERMOD - VERSION 22112 *** *** New Beatrice
 Center *** 02/26/25
 759 *** AERMET - VERSION 16216 *** *** DPM From
 Construction *** 20:55:09

PAGE 11

761 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
 762
 763 *** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5
 YEARS FOR SOURCE GROUP: ALL ***
 764 INCLUDING SOURCE(S): CSLH000 ,
 765
 766 *** DISCRETE CARTESIAN RECEPTOR POINTS ***
 767
 768 ** CONC OF DPM IN **
 MICROGRAMS/M**3

	X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD
771	---	---	---	---	---
772	369328.00	3760849.50	0.00690	369338.00	
	3760849.50	0.00645			
773	369168.00	3760859.50	0.02091	369178.00	
	3760859.50	0.02084			
774	369188.00	3760859.50	0.02050	369198.00	
	3760859.50	0.01990			
775	369208.00	3760859.50	0.01905	369218.00	
	3760859.50	0.01803			
776	369228.00	3760859.50	0.01692	369238.00	
	3760859.50	0.01580			
777	369248.00	3760859.50	0.01470	369258.00	
	3760859.50	0.01364			
778	369268.00	3760859.50	0.01262	369278.00	
	3760859.50	0.01166			
779	369288.00	3760859.50	0.01076	369298.00	
	3760859.50	0.00993			
780	369308.00	3760859.50	0.00918	369318.00	
	3760859.50	0.00851			
781	369328.00	3760859.50	0.00793	369178.00	
	3760869.50	0.02469			
782	369188.00	3760869.50	0.02447	369198.00	
	3760869.50	0.02385			
783	369208.00	3760869.50	0.02285	369218.00	
	3760869.50	0.02159			
784	369228.00	3760869.50	0.02021	369238.00	
	3760869.50	0.01881			
785	369248.00	3760869.50	0.01744	369258.00	
	3760869.50	0.01612			
786	369268.00	3760869.50	0.01486	369278.00	
	3760869.50	0.01369			
787	369288.00	3760869.50	0.01260	369298.00	
	3760869.50	0.01162			
788	369308.00	3760869.50	0.01075	369318.00	
	3760869.50	0.00998			
789	369328.00	3760869.50	0.00932	369198.00	
	3760879.50	0.02908			
790	369208.00	3760879.50	0.02793	369218.00	
	3760879.50	0.02634			
791	369228.00	3760879.50	0.02457	369238.00	
	3760879.50	0.02278			
792	369248.00	3760879.50	0.02103	369258.00	
	3760879.50	0.01936			
793	369268.00	3760879.50	0.01779	369278.00	

794	3760879.50	0.01636		
	369288.00	3760879.50	0.01507	369298.00
	3760879.50	0.01393		
795	369308.00	3760879.50	0.01293	369318.00
	3760879.50	0.01205		
796	369218.00	3760889.50	0.03288	369228.00
	3760889.50	0.03052		
797	369238.00	3760889.50	0.02816	369248.00
	3760889.50	0.02588		
798	369258.00	3760889.50	0.02376	369268.00
	3760889.50	0.02186		
799	369278.00	3760889.50	0.02018	369288.00
	3760889.50	0.01869		
800	369298.00	3760889.50	0.01737	369308.00
	3760889.50	0.01619		
801	369318.00	3760889.50	0.01515	369238.00
	3760899.50	0.03574		
802	369248.00	3760899.50	0.03287	369258.00
	3760899.50	0.03040		
803	369268.00	3760899.50	0.02825	369278.00
	3760899.50	0.02631		
804	369288.00	3760899.50	0.02453	369298.00
	3760899.50	0.02289		
805	369308.00	3760899.50	0.02138	369248.00
	3760909.50	0.04542		
806	369258.00	3760909.50	0.04268	369268.00
	3760909.50	0.03998		
807	369278.00	3760909.50	0.03729	369288.00
	3760909.50	0.03467		
808	369298.00	3760909.50	0.03218	369308.00
	3760909.50	0.02986		
809	369268.00	3760919.50	0.06308	369278.00
	3760919.50	0.05754		
810	369288.00	3760919.50	0.05244	369298.00
	3760919.50	0.04779		
811	369288.00	3760929.50	0.08254	369298.00
	3760929.50	0.07324		

812 **FF** *** AERMOD - VERSION 22112 *** *** New Beatrice *** 02/26/25
Center
813 *** AERMET - VERSION 16216 *** *** DPM From ***
Construction *** 20:55:09
814

PAGE 12

815 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

816

817 *** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5
YEARS FOR SOURCE GROUP: CON ***

818 INCLUDING SOURCE(S): CSLLH000 ,

819

820 *** DISCRETE CARTESIAN RECEPTOR POINTS ***

821

822 ** CONC OF DPM IN **
MICROGRAMS/M**3 **

823	X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD
824	(M)	CONC			
825	---	---	---	---	---
826	369198.00	3760779.50	0.00694	369208.00	
	3760779.50	0.00667			
827	369198.00	3760789.50	0.00771	369208.00	
	3760789.50	0.00740			
828	369218.00	3760789.50	0.00706	369228.00	
	3760789.50	0.00670			
829	369188.00	3760799.50	0.00892	369198.00	
	3760799.50	0.00861			

830	369208.00	3760799.50	0.00826	369218.00
	3760799.50	0.00787		
831	369228.00	3760799.50	0.00747	369238.00
	3760799.50	0.00706		
832	369248.00	3760799.50	0.00665	369188.00
	3760809.50	0.01003		
833	369198.00	3760809.50	0.00968	369208.00
	3760809.50	0.00928		
834	369218.00	3760809.50	0.00884	369228.00
	3760809.50	0.00837		
835	369238.00	3760809.50	0.00790	369248.00
	3760809.50	0.00743		
836	369258.00	3760809.50	0.00697	369268.00
	3760809.50	0.00653		
837	369178.00	3760819.50	0.01168	369188.00
	3760819.50	0.01136		
838	369198.00	3760819.50	0.01097	369208.00
	3760819.50	0.01051		
839	369218.00	3760819.50	0.01000	369228.00
	3760819.50	0.00946		
840	369238.00	3760819.50	0.00891	369248.00
	3760819.50	0.00837		
841	369258.00	3760819.50	0.00784	369268.00
	3760819.50	0.00733		
842	369278.00	3760819.50	0.00685	369288.00
	3760819.50	0.00639		
843	369178.00	3760829.50	0.01332	369188.00
	3760829.50	0.01298		
844	369198.00	3760829.50	0.01253	369208.00
	3760829.50	0.01200		
845	369218.00	3760829.50	0.01140	369228.00
	3760829.50	0.01077		
846	369238.00	3760829.50	0.01013	369248.00
	3760829.50	0.00949		
847	369258.00	3760829.50	0.00888	369268.00
	3760829.50	0.00829		
848	369278.00	3760829.50	0.00772	369288.00
	3760829.50	0.00719		
849	369298.00	3760829.50	0.00669	369308.00
	3760829.50	0.00622		
850	369178.00	3760839.50	0.01532	369188.00
	3760839.50	0.01495		
851	369198.00	3760839.50	0.01445	369208.00
	3760839.50	0.01383		
852	369218.00	3760839.50	0.01313	369228.00
	3760839.50	0.01238		
853	369238.00	3760839.50	0.01162	369248.00
	3760839.50	0.01087		
854	369258.00	3760839.50	0.01014	369268.00
	3760839.50	0.00944		
855	369278.00	3760839.50	0.00878	369288.00
	3760839.50	0.00815		
856	369298.00	3760839.50	0.00756	369308.00
	3760839.50	0.00701		
857	369318.00	3760839.50	0.00652	369328.00
	3760839.50	0.00608		
858	369168.00	3760849.50	0.01796	369178.00
	3760849.50	0.01778		
859	369188.00	3760849.50	0.01741	369198.00
	3760849.50	0.01685		
860	369208.00	3760849.50	0.01613	369218.00
	3760849.50	0.01529		
861	369228.00	3760849.50	0.01438	369238.00
	3760849.50	0.01347		
862	369248.00	3760849.50	0.01257	369258.00
	3760849.50	0.01170		

863 369268.00 3760849.50 0.01086 369278.00
 3760849.50 0.01006
 864 369288.00 3760849.50 0.00931 369298.00
 3760849.50 0.00862
 865 369308.00 3760849.50 0.00798 369318.00
 3760849.50 0.00740

866 *** AERMOD - VERSION 22112 *** *** New Beatrice
 Center *** 02/26/25

867 *** AERMET - VERSION 16216 *** *** DPM From
 Construction *** 20:55:09

868
 869 PAGE 13
 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

870
 871 *** THE ANNUAL AVERAGE CONCENTRATION VALUES AVERAGED OVER 5
 YEARS FOR SOURCE GROUP: CON ***
 INCLUDING SOURCE(S): CSLLH000 ,

872
 873
 874 *** DISCRETE CARTESIAN RECEPTOR POINTS ***

875
 876 ** CONC OF DPM IN **
 MICROGRAMS/M**3

877
 878 X-COORD (M) Y-COORD (M) CONC X-COORD (M) Y-COORD
 (M) CONC

879 - - - - -

880	369328.00	3760849.50	0.00690	369338.00	
	3760849.50	0.00645			
881	369168.00	3760859.50	0.02091	369178.00	
	3760859.50	0.02084			
882	369188.00	3760859.50	0.02050	369198.00	
	3760859.50	0.01990			
883	369208.00	3760859.50	0.01905	369218.00	
	3760859.50	0.01803			
884	369228.00	3760859.50	0.01692	369238.00	
	3760859.50	0.01580			
885	369248.00	3760859.50	0.01470	369258.00	
	3760859.50	0.01364			
886	369268.00	3760859.50	0.01262	369278.00	
	3760859.50	0.01166			
887	369288.00	3760859.50	0.01076	369298.00	
	3760859.50	0.00993			
888	369308.00	3760859.50	0.00918	369318.00	
	3760859.50	0.00851			
889	369328.00	3760859.50	0.00793	369178.00	
	3760869.50	0.02469			
890	369188.00	3760869.50	0.02447	369198.00	
	3760869.50	0.02385			
891	369208.00	3760869.50	0.02285	369218.00	
	3760869.50	0.02159			
892	369228.00	3760869.50	0.02021	369238.00	
	3760869.50	0.01881			
893	369248.00	3760869.50	0.01744	369258.00	
	3760869.50	0.01612			
894	369268.00	3760869.50	0.01486	369278.00	
	3760869.50	0.01369			
895	369288.00	3760869.50	0.01260	369298.00	
	3760869.50	0.01162			
896	369308.00	3760869.50	0.01075	369318.00	
	3760869.50	0.00998			
897	369328.00	3760869.50	0.00932	369198.00	
	3760879.50	0.02908			
898	369208.00	3760879.50	0.02793	369218.00	
	3760879.50	0.02634			
899	369228.00	3760879.50	0.02457	369238.00	

936	369218.00 3760789.50	3760789.50 6.39298	6.57106 (12010508)	(12010508)	369228.00
937	369188.00 3760799.50	3760799.50 6.64925	6.47307 (12010508)	(14122308)	369198.00
938	369208.00 3760799.50	3760799.50 6.89864	6.88226 (12010508)	(12010508)	369218.00
939	369228.00 3760799.50	3760799.50 6.40607	6.72657 (12010508)	(12010508)	369238.00
940	369248.00 3760809.50	3760799.50 6.91191	5.97736 (14122308)	(12010508)	369188.00
941	369198.00 3760809.50	3760809.50 7.21151	6.92661 (12010508)	(12010508)	369208.00
942	369218.00 3760809.50	3760809.50 7.08725	7.25420 (12010508)	(12010508)	369228.00
943	369238.00 3760809.50	3760809.50 6.31886	6.76005 (12010508)	(12010508)	369248.00
944	369258.00 3760809.50	3760809.50 6.36544	6.26540 (14012708)	(14012708)	369268.00
945	369178.00 3760819.50	3760819.50 7.37217	7.38393 (14122308)	(14122308)	369188.00
946	369198.00 3760819.50	3760819.50 7.56805	7.22240 (12010508)	(12010508)	369208.00
947	369218.00 3760819.50	3760819.50 7.47794	7.64043 (12010508)	(12010508)	369228.00
948	369238.00 3760819.50	3760819.50 6.68706	7.14234 (12010508)	(12010508)	369248.00
949	369258.00 3760819.50	3760819.50 6.66824	6.60930 (14012708)	(14012708)	369268.00
950	369278.00 3760819.50	3760819.50 6.45372	6.60396 (14012708)	(14012708)	369288.00
951	369178.00 3760829.50	3760829.50 7.85284	7.75982 (14122308)	(14122308)	369188.00
952	369198.00 3760829.50	3760829.50 7.95765	7.66500 (12010508)	(14122308)	369208.00
953	369218.00 3760829.50	3760829.50 7.90474	8.06419 (12010508)	(12010508)	369228.00
954	369238.00 3760829.50	3760829.50 7.08691	7.55716 (12010508)	(12010508)	369248.00
955	369258.00 3760829.50	3760829.50 6.98634	6.97481 (14012708)	(14012708)	369268.00
956	369278.00 3760829.50	3760829.50 6.70417	6.88291 (14012708)	(14012708)	369288.00
957	369298.00 3760829.50	3760829.50 6.16742	6.46621 (14012708)	(14012708)	369308.00
958	369178.00 3760839.50	3760839.50 8.35015	8.12348 (14122308)	(14122308)	369188.00
959	369198.00 3760839.50	3760839.50 8.38669	8.25054 (12010508)	(14122308)	369208.00
960	369218.00 3760839.50	3760839.50 8.37240	8.53198 (12010508)	(12010508)	369228.00
961	369238.00 3760839.50	3760839.50 7.52056	8.00805 (12010508)	(12010508)	369248.00
962	369258.00 3760839.50	3760839.50 7.32000	7.36172 (14012708)	(14012708)	369268.00
963	369278.00 3760839.50	3760839.50 6.97169	7.17715 (14012708)	(14012708)	369288.00
964	369298.00 3760839.50	3760839.50 6.39336	6.71227 (14012708)	(14012708)	369308.00
965	369318.00 3760839.50	3760839.50 5.53197	6.00334 (14012708)	(14012708)	369328.00
966	369168.00 3760849.50	3760849.50 8.46252	8.24945 (14122308)	(16020808)	369178.00
967	369188.00 3760849.50	3760849.50 8.87848	8.85767 (14122308)	(14122308)	369198.00
968	369208.00 3760849.50	3760849.50 9.05227	8.86054 (12010508)	(12010508)	369218.00

969	369228.00	3760849.50	8.88838	(12010508)	369238.00
	3760849.50	8.50180	(12010508)		
970	369248.00	3760849.50	7.99405	(12010508)	369258.00
	3760849.50	7.76993	(14012708)		
971	369268.00	3760849.50	7.67077	(14012708)	369278.00
	3760849.50	7.49011	(14012708)		
972	369288.00	3760849.50	7.25897	(14012708)	369298.00
	3760849.50	6.97891	(14012708)		
973	369308.00	3760849.50	6.63947	(14012708)	369318.00
	3760849.50	6.22464	(14012708)		

974 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
975 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09

976
977 PAGE 15
*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
978
979 *** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES
FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): CSLLH000 ,

982 *** DISCRETE CARTESIAN RECEPTOR POINTS ***

	** CONC OF DPM		IN		
	MICROGRAMS/M**3			**	
986	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)
	Y-COORD (M)	CONC	(YYMMDDHH)		
987	-----	-----	-----	-----	-----
988	369328.00	3760849.50	5.72103	(14012708)	369338.00
	3760849.50	5.12411	(14012708)		
989	369168.00	3760859.50	9.06264	(16020808)	369178.00
	3760859.50	8.80793	(16020808)		
990	369188.00	3760859.50	9.36224	(14122308)	369198.00
	3760859.50	9.54949	(14122308)		
991	369208.00	3760859.50	9.38873	(12010508)	369218.00
	3760859.50	9.63754	(12010508)		
992	369228.00	3760859.50	9.46055	(12010508)	369238.00
	3760859.50	9.04412	(12010508)		
993	369248.00	3760859.50	8.51294	(12010508)	369258.00
	3760859.50	8.19858	(14012708)		
994	369268.00	3760859.50	8.04242	(14012708)	369278.00
	3760859.50	7.82645	(14012708)		
995	369288.00	3760859.50	7.57059	(14012708)	369298.00
	3760859.50	7.27050	(14012708)		
996	369308.00	3760859.50	6.90932	(14012708)	369318.00
	3760859.50	6.46748	(14012708)		
997	369328.00	3760859.50	5.92809	(14012708)	369178.00
	3760869.50	9.81485	(16020808)		
998	369188.00	3760869.50	9.84108	(14122308)	369198.00
	3760869.50	10.25797	(14122308)		
999	369208.00	3760869.50	10.12172	(14122308)	369218.00
	3760869.50	10.30063	(12010508)		
1000	369228.00	3760869.50	10.09901	(12010508)	369238.00
	3760869.50	9.64283	(12010508)		
1001	369248.00	3760869.50	9.08615	(12010508)	369258.00
	3760869.50	8.65014	(14012708)		
1002	369268.00	3760869.50	8.44047	(14012708)	369278.00
	3760869.50	8.19189	(14012708)		
1003	369288.00	3760869.50	7.91291	(14012708)	369298.00
	3760869.50	7.59125	(14012708)		
1004	369308.00	3760869.50	7.20645	(14012708)	369318.00
	3760869.50	6.73469	(14012708)		
1005	369328.00	3760869.50	6.15633	(14012708)	369198.00

1006	3760879.50	10.98383	(14122308)		
	369208.00	3760879.50	11.04693	(14122308)	369218.00
	3760879.50	11.06051	(12010508)		
1007	369228.00	3760879.50	10.81282	(12010508)	369238.00
	3760879.50	10.30715	(12010508)		
1008	369248.00	3760879.50	9.72308	(12010508)	369258.00
	3760879.50	9.12933	(14012708)		
1009	369268.00	3760879.50	8.87313	(14012708)	369278.00
	3760879.50	8.59431	(14012708)		
1010	369288.00	3760879.50	8.29068	(14012708)	369298.00
	3760879.50	7.94565	(14012708)		
1011	369308.00	3760879.50	7.53502	(14012708)	369318.00
	3760879.50	7.03076	(14012708)		
1012	369218.00	3760889.50	11.93392	(12010508)	369228.00
	3760889.50	11.60861	(12010508)		
1013	369238.00	3760889.50	11.04998	(12010508)	369248.00
	3760889.50	10.43221	(12010508)		
1014	369258.00	3760889.50	9.75343	(12010508)	369268.00
	3760889.50	9.34957	(14012708)		
1015	369278.00	3760889.50	9.04080	(14012708)	369288.00
	3760889.50	8.71077	(14012708)		
1016	369298.00	3760889.50	8.33965	(14012708)	369308.00
	3760889.50	7.90022	(14012708)		
1017	369318.00	3760889.50	7.36004	(14012708)	369238.00
	3760899.50	11.88250	(12010508)		
1018	369248.00	3760899.50	11.22995	(12010508)	369258.00
	3760899.50	10.51766	(12010508)		
1019	369268.00	3760899.50	9.87857	(14012708)	369278.00
	3760899.50	9.53851	(14012708)		
1020	369288.00	3760899.50	9.17957	(14012708)	369298.00
	3760899.50	8.77991	(14012708)		
1021	369308.00	3760899.50	8.30808	(14012708)	369248.00
	3760909.50	12.12331	(12010508)		
1022	369258.00	3760909.50	11.37597	(12010508)	369268.00
	3760909.50	10.54617	(12010508)		
1023	369278.00	3760909.50	10.09312	(14012708)	369288.00
	3760909.50	9.70371	(14012708)		
1024	369298.00	3760909.50	9.27236	(14012708)	369308.00
	3760909.50	8.76512	(14012708)		
1025	369268.00	3760919.50	11.46829	(12010508)	369278.00
	3760919.50	10.70659	(14012708)		
1026	369288.00	3760919.50	10.28718	(14012708)	369298.00
	3760919.50	9.82280	(14012708)		
1027	369288.00	3760929.50	10.92750	(14012708)	369298.00
	3760929.50	10.43307	(14012708)		

1028 *** AERMOD - VERSION 22112 *** *** New Beatrice ***
Center 02/26/25
1029 *** AERMET - VERSION 16216 *** *** DPM From ***
Construction *** 20:55:09

1030

1031 PAGE 16
*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

1032
1033 *** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES
FOR SOURCE GROUP: CON ***
INCLUDING SOURCE(S): CSLLH000 ,

1034
1035
1036 *** DISCRETE CARTESIAN RECEPTOR POINTS ***

1037
1038 ** CONC OF DPM IN **
MICROGRAMS/M**3 **

1039
1040 X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M)
Y-COORD (M) CONC (YYMMDDHH)

1041 - - - - -
- - - - -

1042	369198.00	3760779.50	6.14410	(12010508)	369208.00
	3760779.50	6.29408	(12010508)		
1043	369198.00	3760789.50	6.38895	(12010508)	369208.00
	3760789.50	6.57738	(12010508)		
1044	369218.00	3760789.50	6.57106	(12010508)	369228.00
	3760789.50	6.39298	(12010508)		
1045	369188.00	3760799.50	6.47307	(14122308)	369198.00
	3760799.50	6.64925	(12010508)		
1046	369208.00	3760799.50	6.88226	(12010508)	369218.00
	3760799.50	6.89864	(12010508)		
1047	369228.00	3760799.50	6.72657	(12010508)	369238.00
	3760799.50	6.40607	(12010508)		
1048	369248.00	3760799.50	5.97736	(12010508)	369188.00
	3760809.50	6.91191	(14122308)		
1049	369198.00	3760809.50	6.92661	(12010508)	369208.00
	3760809.50	7.21151	(12010508)		
1050	369218.00	3760809.50	7.25420	(12010508)	369228.00
	3760809.50	7.08725	(12010508)		
1051	369238.00	3760809.50	6.76005	(12010508)	369248.00
	3760809.50	6.31886	(12010508)		
1052	369258.00	3760809.50	6.26540	(14012708)	369268.00
	3760809.50	6.36544	(14012708)		
1053	369178.00	3760819.50	7.38393	(14122308)	369188.00
	3760819.50	7.37217	(14122308)		
1054	369198.00	3760819.50	7.22240	(12010508)	369208.00
	3760819.50	7.56805	(12010508)		
1055	369218.00	3760819.50	7.64043	(12010508)	369228.00
	3760819.50	7.47794	(12010508)		
1056	369238.00	3760819.50	7.14234	(12010508)	369248.00
	3760819.50	6.68706	(12010508)		
1057	369258.00	3760819.50	6.60930	(14012708)	369268.00
	3760819.50	6.66824	(14012708)		
1058	369278.00	3760819.50	6.60396	(14012708)	369288.00
	3760819.50	6.45372	(14012708)		
1059	369178.00	3760829.50	7.75982	(14122308)	369188.00
	3760829.50	7.85284	(14122308)		
1060	369198.00	3760829.50	7.66500	(14122308)	369208.00
	3760829.50	7.95765	(12010508)		
1061	369218.00	3760829.50	8.06419	(12010508)	369228.00
	3760829.50	7.90474	(12010508)		
1062	369238.00	3760829.50	7.55716	(12010508)	369248.00
	3760829.50	7.08691	(12010508)		
1063	369258.00	3760829.50	6.97481	(14012708)	369268.00
	3760829.50	6.98634	(14012708)		
1064	369278.00	3760829.50	6.88291	(14012708)	369288.00
	3760829.50	6.70417	(14012708)		
1065	369298.00	3760829.50	6.46621	(14012708)	369308.00
	3760829.50	6.16742	(14012708)		
1066	369178.00	3760839.50	8.12348	(14122308)	369188.00
	3760839.50	8.35015	(14122308)		
1067	369198.00	3760839.50	8.25054	(14122308)	369208.00
	3760839.50	8.38669	(12010508)		
1068	369218.00	3760839.50	8.53198	(12010508)	369228.00
	3760839.50	8.37240	(12010508)		
1069	369238.00	3760839.50	8.00805	(12010508)	369248.00
	3760839.50	7.52056	(12010508)		
1070	369258.00	3760839.50	7.36172	(14012708)	369268.00
	3760839.50	7.32000	(14012708)		
1071	369278.00	3760839.50	7.17715	(14012708)	369288.00
	3760839.50	6.97169	(14012708)		
1072	369298.00	3760839.50	6.71227	(14012708)	369308.00
	3760839.50	6.39336	(14012708)		
1073	369318.00	3760839.50	6.00334	(14012708)	369328.00
	3760839.50	5.53197	(14012708)		
1074	369168.00	3760849.50	8.24945	(16020808)	369178.00
	3760849.50	8.46252	(14122308)		

1075	369188.00	3760849.50	8.85767	(14122308)	369198.00
	3760849.50	8.87848	(14122308)		
1076	369208.00	3760849.50	8.86054	(12010508)	369218.00
	3760849.50	9.05227	(12010508)		
1077	369228.00	3760849.50	8.88838	(12010508)	369238.00
	3760849.50	8.50180	(12010508)		
1078	369248.00	3760849.50	7.99405	(12010508)	369258.00
	3760849.50	7.76993	(14012708)		
1079	369268.00	3760849.50	7.67077	(14012708)	369278.00
	3760849.50	7.49011	(14012708)		
1080	369288.00	3760849.50	7.25897	(14012708)	369298.00
	3760849.50	6.97891	(14012708)		
1081	369308.00	3760849.50	6.63947	(14012708)	369318.00
	3760849.50	6.22464	(14012708)		

1082 ***** AERMOD - VERSION 22112 *** *** New Beatrice**
Center *** 02/26/25

1083 ***** AERMET - VERSION 16216 *** *** DPM From**
Construction *** 20:55:09

1084

1085 ***** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U***

1086

1087 ***** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES**
FOR SOURCE GROUP: CON ***
INCLUDING SOURCE(S): CSLLH000 ,

1088

1089 ***** DISCRETE CARTESIAN RECEPTOR POINTS *****

1090

1091

1092 **** CONC OF DPM IN ****
MICROGRAMS/M3**

1093	X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)
1094	Y-COORD (M)	CONC	(YYMMDDHH)		
1095	---	---	---	---	---
1096	369328.00	3760849.50	5.72103	(14012708)	369338.00
	3760849.50	5.12411	(14012708)		
1097	369168.00	3760859.50	9.06264	(16020808)	369178.00
	3760859.50	8.80793	(16020808)		
1098	369188.00	3760859.50	9.36224	(14122308)	369198.00
	3760859.50	9.54949	(14122308)		
1099	369208.00	3760859.50	9.38873	(12010508)	369218.00
	3760859.50	9.63754	(12010508)		
1100	369228.00	3760859.50	9.46055	(12010508)	369238.00
	3760859.50	9.04412	(12010508)		
1101	369248.00	3760859.50	8.51294	(12010508)	369258.00
	3760859.50	8.19858	(14012708)		
1102	369268.00	3760859.50	8.04242	(14012708)	369278.00
	3760859.50	7.82645	(14012708)		
1103	369288.00	3760859.50	7.57059	(14012708)	369298.00
	3760859.50	7.27050	(14012708)		
1104	369308.00	3760859.50	6.90932	(14012708)	369318.00
	3760859.50	6.46748	(14012708)		
1105	369328.00	3760859.50	5.92809	(14012708)	369178.00
	3760869.50	9.81485	(16020808)		
1106	369188.00	3760869.50	9.84108	(14122308)	369198.00
	3760869.50	10.25797	(14122308)		
1107	369208.00	3760869.50	10.12172	(14122308)	369218.00
	3760869.50	10.30063	(12010508)		
1108	369228.00	3760869.50	10.09901	(12010508)	369238.00
	3760869.50	9.64283	(12010508)		
1109	369248.00	3760869.50	9.08615	(12010508)	369258.00
	3760869.50	8.65014	(14012708)		
1110	369268.00	3760869.50	8.44047	(14012708)	369278.00
	3760869.50	8.19189	(14012708)		
1111	369288.00	3760869.50	7.91291	(14012708)	369298.00

1112	3760869.50	7.59125	(14012708)		
	369308.00	3760869.50	7.20645	(14012708)	369318.00
	3760869.50	6.73469	(14012708)		
1113	369328.00	3760869.50	6.15633	(14012708)	369198.00
	3760879.50	10.98383	(14122308)		
1114	369208.00	3760879.50	11.04693	(14122308)	369218.00
	3760879.50	11.06051	(12010508)		
1115	369228.00	3760879.50	10.81282	(12010508)	369238.00
	3760879.50	10.30715	(12010508)		
1116	369248.00	3760879.50	9.72308	(12010508)	369258.00
	3760879.50	9.12933	(14012708)		
1117	369268.00	3760879.50	8.87313	(14012708)	369278.00
	3760879.50	8.59431	(14012708)		
1118	369288.00	3760879.50	8.29068	(14012708)	369298.00
	3760879.50	7.94565	(14012708)		
1119	369308.00	3760879.50	7.53502	(14012708)	369318.00
	3760879.50	7.03076	(14012708)		
1120	369218.00	3760889.50	11.93392	(12010508)	369228.00
	3760889.50	11.60861	(12010508)		
1121	369238.00	3760889.50	11.04998	(12010508)	369248.00
	3760889.50	10.43221	(12010508)		
1122	369258.00	3760889.50	9.75343	(12010508)	369268.00
	3760889.50	9.34957	(14012708)		
1123	369278.00	3760889.50	9.04080	(14012708)	369288.00
	3760889.50	8.71077	(14012708)		
1124	369298.00	3760889.50	8.33965	(14012708)	369308.00
	3760889.50	7.90022	(14012708)		
1125	369318.00	3760889.50	7.36004	(14012708)	369238.00
	3760899.50	11.88250	(12010508)		
1126	369248.00	3760899.50	11.22995	(12010508)	369258.00
	3760899.50	10.51766	(12010508)		
1127	369268.00	3760899.50	9.87857	(14012708)	369278.00
	3760899.50	9.53851	(14012708)		
1128	369288.00	3760899.50	9.17957	(14012708)	369298.00
	3760899.50	8.77991	(14012708)		
1129	369308.00	3760899.50	8.30808	(14012708)	369248.00
	3760909.50	12.12331	(12010508)		
1130	369258.00	3760909.50	11.37597	(12010508)	369268.00
	3760909.50	10.54617	(12010508)		
1131	369278.00	3760909.50	10.09312	(14012708)	369288.00
	3760909.50	9.70371	(14012708)		
1132	369298.00	3760909.50	9.27236	(14012708)	369308.00
	3760909.50	8.76512	(14012708)		
1133	369268.00	3760919.50	11.46829	(12010508)	369278.00
	3760919.50	10.70659	(14012708)		
1134	369288.00	3760919.50	10.28718	(14012708)	369298.00
	3760919.50	9.82280	(14012708)		
1135	369288.00	3760929.50	10.92750	(14012708)	369298.00
	3760929.50	10.43307	(14012708)		

1136 ***** AERMOD - VERSION 22112 ***** ***** New Beatrice** ******* **02/26/25**
 Center
 1137 ***** AERMET - VERSION 16216 ***** ***** DPM From** ******* **20:55:09**
 Construction
 1138
 1139 ***** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U***
 1140
 1141 ***** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED**
OVER 5 YEARS ***
 1142
 1143
 1144 **** CONC OF DPM IN**
MICROGRAMS/M3** ******
 1145
 1146

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1147  GROUP ID              AVERAGE CONC              RECEPTOR (XR, YR, ZELEV,
      ZHILL, ZFLAG)  OF TYPE  GRID-ID
1148  -----
1149
1150  ALL      1ST HIGHEST VALUE IS      0.08254 AT ( 369288.00, 3760929.50, 4.27,
      4.27, 0.00) DC
1151      2ND HIGHEST VALUE IS      0.07324 AT ( 369298.00, 3760929.50, 4.27,
      4.27, 0.00) DC
1152      3RD HIGHEST VALUE IS      0.06308 AT ( 369268.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1153      4TH HIGHEST VALUE IS      0.05754 AT ( 369278.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1154      5TH HIGHEST VALUE IS      0.05244 AT ( 369288.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1155      6TH HIGHEST VALUE IS      0.04779 AT ( 369298.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1156      7TH HIGHEST VALUE IS      0.04542 AT ( 369248.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1157      8TH HIGHEST VALUE IS      0.04268 AT ( 369258.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1158      9TH HIGHEST VALUE IS      0.03998 AT ( 369268.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1159      10TH HIGHEST VALUE IS     0.03729 AT ( 369278.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1160
1161  CON      1ST HIGHEST VALUE IS      0.08254 AT ( 369288.00, 3760929.50, 4.27,
      4.27, 0.00) DC
1162      2ND HIGHEST VALUE IS      0.07324 AT ( 369298.00, 3760929.50, 4.27,
      4.27, 0.00) DC
1163      3RD HIGHEST VALUE IS      0.06308 AT ( 369268.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1164      4TH HIGHEST VALUE IS      0.05754 AT ( 369278.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1165      5TH HIGHEST VALUE IS      0.05244 AT ( 369288.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1166      6TH HIGHEST VALUE IS      0.04779 AT ( 369298.00, 3760919.50, 4.27,
      4.27, 0.00) DC
1167      7TH HIGHEST VALUE IS      0.04542 AT ( 369248.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1168      8TH HIGHEST VALUE IS      0.04268 AT ( 369258.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1169      9TH HIGHEST VALUE IS      0.03998 AT ( 369268.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1170      10TH HIGHEST VALUE IS     0.03729 AT ( 369278.00, 3760909.50, 4.27,
      4.27, 0.00) DC
1171
1172
1173  *** RECEPTOR TYPES:  GC = GRIDCART
1174                        GP = GRIDPOLR
1175                        DC = DISCCART
1176                        DP = DISCPOLR
1177  *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
1178  *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09
1179
1180  *** MODELOPTs:  RegDFAULT  CONC  ELEV  NODRYDPLT  NOWETDPLT  URBAN  ADJ_U*
1181
1182  *** THE SUMMARY OF HIGHEST 1-HR RESULTS
***
1183
1184
1185  ** CONC OF DPM  IN
MICROGRAMS/M**3 **

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1186
1187

DATE

1188 GROUP ID AVERAGE CONC NETWORK RECEPTOR (XR,
1189 YR, ZELEV, ZHILL, ZFLAG) OF TYPE GRID-ID (YYMMDDHH) -----

1190
1191 ALL HIGH 1ST HIGH VALUE IS 12.12331 ON 12010508: AT (369248.00,
3760909.50, 4.27, 4.27, 0.00) DC
1192
1193 CON HIGH 1ST HIGH VALUE IS 12.12331 ON 12010508: AT (369248.00,
3760909.50, 4.27, 4.27, 0.00) DC

1194
1195
1196 *** RECEPTOR TYPES: GC = GRIDCART
1197 GP = GRIDPOLR
1198 DC = DISCCART
1199 DP = DISCPOLR

1200 *** AERMOD - VERSION 22112 *** *** New Beatrice
Center *** 02/26/25
1201 *** AERMET - VERSION 16216 *** *** DPM From
Construction *** 20:55:09

1202 PAGE 20
1203 *** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
1204

1205 *** Message Summary : AERMOD Model Execution ***

1206 ----- Summary of Total Messages -----

1207
1208
1209 A Total of 0 Fatal Error Message(s)
1210 A Total of 7 Warning Message(s)
1211 A Total of 718 Informational Message(s)
1212
1213 A Total of 43848 Hours Were Processed
1214
1215 A Total of 458 Calm Hours Identified
1216
1217 A Total of 260 Missing Hours Identified (0.59 Percent)
1218

1219 ***** FATAL ERROR MESSAGES *****
1220 *** NONE ***
1221
1222

1223 ***** WARNING MESSAGES *****
1224 CO W320 11 URBOPT: Input Parameter May Be Out-of-Range for Parameter
URB-POP
1225 ME W186 362 MEOPT: THRESH_1MIN 1-min ASOS wind speed threshold
used 0.50
1226 ME W187 362 MEOPT: ADJ_U* Option for Stable Low Winds used in
AERMET
1227 OU W565 367 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
1228 OU W565 368 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
1229 OU W565 369 PERPLT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
1230 OU W565 370 PERPLT: Possible Conflict With Dynamically Allocated FUNIT
PLOTFILE
1231

1232 *****
1233 *** AERMOD Finishes Successfully ***
1234

1235
1236
1237

** BREEZE AERMOD
** Trinity Consultants
** VERSION 11.0

CO STARTING
CO TITLEONE New Beatrice Center
CO TITLETWO DPM From Construction
CO MODELOPT DFAULT CONC NODRYDPLT NOWETDPLT
CO RUNORNOT RUN
CO AVERTIME 1 PERIOD
CO URBANOPT 1887 AREA1 1
CO POLLUTID OTHER
CO FINISHED

SO STARTING
SO ELEVUNIT METERS
SO LOCATION YUNCG001 VOLUME 369217.8 3760976 0
** SRCDESCR Construction Sources
SO SRCPARAM YUNCG001 0.01354642 4.15 15.1 7.5
SO URBANSRC YUNCG001
SO EMISFACT YUNCG001 HRDOW 0 0 0 0 0 0 0 0 1 1 1 1 0 1 1 1 1 0 0 0 0 0 0 0 0 0
SO EMISFACT YUNCG001 HRDOW 0
SO EMISFACT YUNCG001 HRDOW 0
SO SRCGROUP ALL
SO SRCGROUP CON YUNCG001
SO FINISHED

RE STARTING
RE ELEVUNIT METERS
RE DISCCART 369198.0 3760779.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369208.0 3760779.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369198.0 3760789.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369208.0 3760789.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369218.0 3760789.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369228.0 3760789.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369188.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369198.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369208.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369218.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369228.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369238.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369248.0 3760799.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369188.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369198.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369208.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369218.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369228.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369238.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369248.0 3760809.5 4.27 4.27
** RCPDESCR closest receptors

RE DISCCART 369288.0 3760929.5 4.27 4.27
** RCPDESCR closest receptors
RE DISCCART 369298.0 3760929.5 4.27 4.27
** RCPDESCR closest receptors
RE FINISHED

ME STARTING
ME SURFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.SFC"
** SURFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.SFC"
ME PROFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.PFL"
** PROFFILE "G:\CLARKA~1\PR07BF~1\KLAX_V9.PFL"
ME SURFDATA 23174 2012
ME UAIRDATA 3190 2012
ME PROFBASE 30 METERS
ME FINISHED

OU STARTING
OU RECTABLE 1 FIRST
OU FILEFORM FIX
OU MAXTABLE 1 1
OU PLOTFILE 1 ALL FIRST ALL`1`FIRST.plt 10000
OU PLOTFILE 1 CON FIRST CON`1`FIRST.plt 10001
OU PLOTFILE PERIOD ALL ALL`PERIOD.plt 10002
OU PLOTFILE PERIOD CON CON`PERIOD.plt 10003
OU FINISHED

*** Message Summary For AERMOD Model Setup ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 7 Warning Message(s)
A Total of 0 Informational Message(s)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
CO W320 11 URBOPT: Input Parameter May Be Out-of-Range for Parameter URB-POP
ME W186 360 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 360 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
OU W565 366 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT PLOTFILE
OU W565 367 OUPLOT: Possible Conflict With Dynamically Allocated FUNIT PLOTFILE
OU W565 368 PERPLT: Possible Conflict With Dynamically Allocated FUNIT PLOTFILE
OU W565 369 PERPLT: Possible Conflict With Dynamically Allocated FUNIT PLOTFILE

*** SETUP Finishes Successfully ***

▲ *** AERMOD - VERSION 22112 *** ** New Beatrice Center ***
02/28/25
*** AERMET - VERSION 16216 *** ** DPM From Construction ***
16:27:42

PAGE 1
*** MODELOPTS: RegDFault CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:
* Model Uses Regulatory DEFAULT Options
* Model Is Setup For Calculation of Average CONCentration Values.
* NO GAS DEPOSITION Data Provided.

* NO PARTICLE DEPOSITION Data Provided.
* Model Uses NO DRY DEPLETION. DDPLETE = F
* Model Uses NO WET DEPLETION. WETDPLT = F
* Stack-tip Downwash.
* Model Accounts for ELEVated Terrain Effects.
* Use Calms Processing Routine.
* Use Missing Data Processing Routine.
* No Exponential Decay.
* Model Uses URBAN Dispersion Algorithm for the SBL for 1 Source(s),
for Total of 1 Urban Area(s):
Urban Population = 1887.0 ; Urban Roughness Length = 1.000 m
* Urban Roughness Length of 1.0 Meter Used.
* ADJ_U* - Use ADJ_U* option for SBL in AERMET
* CCVR_Sub - Meteorological data includes CCVR substitutions
* TEMP_Sub - Meteorological data includes TEMP substitutions
* Model Assumes No FLAGPOLE Receptor Heights.
* The User Specified a Pollutant Type of: OTHER

**Model Calculates 1 Short Term Average(s) of: 1-HR
and Calculates PERIOD Averages

**This Run Includes: 1 Source(s); 2 Source Group(s); and 160 Receptor(s)

with: 0 POINT(s), including
0 POINTCAP(s) and 0 POINTHOR(s)
and: 1 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNNING After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of PERIOD Averages by Receptor
Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
Model Outputs Tables of Overall Maximum Short Term Values (MAXTABLE Keyword)
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
m for Missing Hours
b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 30.00 ; Decay Coef. = 0.000 ; Rot. Angle
= 0.0
Emission Units = GRAMS/SEC ; Emission Rate Unit Factor =
0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.5 MB of RAM.

**Input Runstream File: aermod.inp

**Output Print File: aermod.out

▲ *** AERMET - VERSION 22112 *** ** New Beatrice Center ***
02/28/25
*** AERMET - VERSION 16216 *** ** DPM From Construction ***
16:27:42

PAGE 2

*** MODELOPTS: RegDFault CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00
 16 .0000E+00
 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00
 24 .0000E+00

DAY OF WEEK = SUNDAY

1 .0000E+00 2 .0000E+00 3 .0000E+00 4 .0000E+00 5 .0000E+00 6 .0000E+00 7 .0000E+00
 8 .0000E+00
 9 .0000E+00 10 .0000E+00 11 .0000E+00 12 .0000E+00 13 .0000E+00 14 .0000E+00 15 .0000E+00
 16 .0000E+00
 17 .0000E+00 18 .0000E+00 19 .0000E+00 20 .0000E+00 21 .0000E+00 22 .0000E+00 23 .0000E+00
 24 .0000E+00

▲ *** AERMOD - VERSION 22112 *** ** New Beatrice Center ***
 02/28/25
 *** AERMET - VERSION 16216 *** ** DPM From Construction ***
 16:27:42

PAGE 6

*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
 (METERS)

(369198.0, 3760779.5,	4.3,	4.3,	0.0);	(369208.0, 3760779.5,	4.3,	4.3,
0.0);				0.0);		
(369198.0, 3760789.5,	4.3,	4.3,	0.0);	(369208.0, 3760789.5,	4.3,	4.3,
0.0);				0.0);		
(369218.0, 3760789.5,	4.3,	4.3,	0.0);	(369228.0, 3760789.5,	4.3,	4.3,
0.0);				0.0);		
(369188.0, 3760799.5,	4.3,	4.3,	0.0);	(369198.0, 3760799.5,	4.3,	4.3,
0.0);				0.0);		
(369208.0, 3760799.5,	4.3,	4.3,	0.0);	(369218.0, 3760799.5,	4.3,	4.3,
0.0);				0.0);		
(369228.0, 3760799.5,	4.3,	4.3,	0.0);	(369238.0, 3760799.5,	4.3,	4.3,
0.0);				0.0);		
(369248.0, 3760799.5,	4.3,	4.3,	0.0);	(369188.0, 3760809.5,	4.3,	4.3,
0.0);				0.0);		
(369198.0, 3760809.5,	4.3,	4.3,	0.0);	(369208.0, 3760809.5,	4.3,	4.3,
0.0);				0.0);		
(369218.0, 3760809.5,	4.3,	4.3,	0.0);	(369228.0, 3760809.5,	4.3,	4.3,
0.0);				0.0);		
(369238.0, 3760809.5,	4.3,	4.3,	0.0);	(369248.0, 3760809.5,	4.3,	4.3,
0.0);				0.0);		
(369258.0, 3760809.5,	4.3,	4.3,	0.0);	(369268.0, 3760809.5,	4.3,	4.3,
0.0);				0.0);		
(369178.0, 3760819.5,	4.3,	4.3,	0.0);	(369188.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369198.0, 3760819.5,	4.3,	4.3,	0.0);	(369208.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369218.0, 3760819.5,	4.3,	4.3,	0.0);	(369228.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369238.0, 3760819.5,	4.3,	4.3,	0.0);	(369248.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369258.0, 3760819.5,	4.3,	4.3,	0.0);	(369268.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369278.0, 3760819.5,	4.3,	4.3,	0.0);	(369288.0, 3760819.5,	4.3,	4.3,
0.0);				0.0);		
(369178.0, 3760829.5,	4.3,	4.3,	0.0);	(369188.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		
(369198.0, 3760829.5,	4.3,	4.3,	0.0);	(369208.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		
(369218.0, 3760829.5,	4.3,	4.3,	0.0);	(369228.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		
(369238.0, 3760829.5,	4.3,	4.3,	0.0);	(369248.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		
(369258.0, 3760829.5,	4.3,	4.3,	0.0);	(369268.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		
(369278.0, 3760829.5,	4.3,	4.3,	0.0);	(369288.0, 3760829.5,	4.3,	4.3,
0.0);				0.0);		

(369298.0, 3760829.5, 0.0);	4.3,	4.3,	0.0);	(369308.0, 3760829.5, 4.3,	4.3,
(369178.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369188.0, 3760839.5, 4.3,	4.3,
(369198.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369208.0, 3760839.5, 4.3,	4.3,
(369218.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369228.0, 3760839.5, 4.3,	4.3,
(369238.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369248.0, 3760839.5, 4.3,	4.3,
(369258.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369268.0, 3760839.5, 4.3,	4.3,
(369278.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369288.0, 3760839.5, 4.3,	4.3,
(369298.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369308.0, 3760839.5, 4.3,	4.3,
(369318.0, 3760839.5, 0.0);	4.3,	4.3,	0.0);	(369328.0, 3760839.5, 4.3,	4.3,
(369168.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369178.0, 3760849.5, 4.3,	4.3,
(369188.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369198.0, 3760849.5, 4.3,	4.3,
(369208.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369218.0, 3760849.5, 4.3,	4.3,
(369228.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369238.0, 3760849.5, 4.3,	4.3,
(369248.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369258.0, 3760849.5, 4.3,	4.3,
(369268.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369278.0, 3760849.5, 4.3,	4.3,
(369288.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369298.0, 3760849.5, 4.3,	4.3,
(369308.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369318.0, 3760849.5, 4.3,	4.3,
(369328.0, 3760849.5, 0.0);	4.3,	4.3,	0.0);	(369338.0, 3760849.5, 4.3,	4.3,
(369168.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369178.0, 3760859.5, 4.3,	4.3,
(369188.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369198.0, 3760859.5, 4.3,	4.3,
(369208.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369218.0, 3760859.5, 4.3,	4.3,
(369228.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369238.0, 3760859.5, 4.3,	4.3,

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*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** DISCRETE CARTESIAN RECEPTORS ***
 (X-COORD, Y-COORD, ZELEV, ZHILL, ZFLAG)
 (METERS)

(369248.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369258.0, 3760859.5, 4.3,	4.3,
(369268.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369278.0, 3760859.5, 4.3,	4.3,
(369288.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369298.0, 3760859.5, 4.3,	4.3,
(369308.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369318.0, 3760859.5, 4.3,	4.3,
(369328.0, 3760859.5, 0.0);	4.3,	4.3,	0.0);	(369178.0, 3760869.5, 4.3,	4.3,
(369188.0, 3760869.5, 0.0);	4.3,	4.3,	0.0);	(369198.0, 3760869.5, 4.3,	4.3,
(369208.0, 3760869.5, 0.0);	4.3,	4.3,	0.0);	(369218.0, 3760869.5, 4.3,	4.3,

2.0	12	01	01	1	11	168.5	0.173	1.222	0.005	391.	173.	-2.8	0.10	2.55	0.21	1.25	27.	10.1	297.5
2.0	12	01	01	1	12	186.3	0.227	1.521	0.005	680.	260.	-5.7	0.10	2.55	0.20	1.86	63.	10.1	299.2
2.0	12	01	01	1	13	190.2	0.253	1.817	0.005	1136.	306.	-7.7	0.10	2.55	0.20	2.16	300.	10.1	296.4
2.0	12	01	01	1	14	160.2	0.448	1.842	0.005	1405.	720.	-50.6	0.10	2.55	0.21	4.68	276.	10.1	291.4
2.0	12	01	01	1	15	108.6	0.466	1.661	0.005	1520.	764.	-83.9	0.10	2.55	0.24	5.02	270.	10.1	289.9
2.0	12	01	01	1	16	37.3	0.455	1.167	0.005	1543.	737.	-228.8	0.10	2.55	0.33	5.10	270.	10.1	288.1
2.0	12	01	01	1	17	-31.4	0.381	-9.000	-9.000	-999.	569.	159.8	0.10	2.55	0.59	4.54	268.	10.1	287.5
2.0	12	01	01	1	18	-36.0	0.365	-9.000	-9.000	-999.	529.	146.4	0.10	2.55	1.00	4.37	274.	10.1	286.4
2.0	12	01	01	1	19	-29.6	0.301	-9.000	-9.000	-999.	398.	99.5	0.10	2.55	1.00	3.63	271.	10.1	286.4
2.0	12	01	01	1	20	-21.0	0.213	-9.000	-9.000	-999.	239.	49.9	0.10	2.55	1.00	2.61	271.	10.1	286.4
2.0	12	01	01	1	21	-10.3	0.140	-9.000	-9.000	-999.	128.	24.0	0.10	2.55	1.00	1.77	281.	10.1	286.4
2.0	12	01	01	1	22	-22.9	0.230	-9.000	-9.000	-999.	265.	58.3	0.10	2.55	1.00	2.81	270.	10.1	285.9
2.0	12	01	01	1	23	-37.0	0.374	-9.000	-9.000	-999.	550.	154.2	0.10	2.55	1.00	4.48	272.	10.1	285.9
2.0	12	01	01	1	24	-24.0	0.243	-9.000	-9.000	-999.	299.	65.0	0.10	2.55	1.00	2.96	274.	10.1	285.9

First hour of profile data
YR MO DY HR HEIGHT F WDIR WSPD AMB_TMP sigmaA sigmaW sigmaV
12 01 01 01 10.1 1 246. 1.35 282.6 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)
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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
*** THE PERIOD (43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL
*** INCLUDING SOURCE(S): YUNCG001 ,
*** DISCRETE CARTESIAN RECEPTOR POINTS ***

		** CONC OF OTHER	IN MICROGRAMS/M**3		**
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
369198.00	3760779.50	0.00952	369208.00	3760779.50	0.00916
369198.00	3760789.50	0.01062	369208.00	3760789.50	0.01021
369218.00	3760789.50	0.00979	369228.00	3760789.50	0.00937
369188.00	3760799.50	0.01233	369198.00	3760799.50	0.01192
369208.00	3760799.50	0.01145	369218.00	3760799.50	0.01097
369228.00	3760799.50	0.01048	369238.00	3760799.50	0.01002
369248.00	3760799.50	0.00958	369188.00	3760809.50	0.01393

369198.00	3760809.50	0.01346	369208.00	3760809.50	0.01293
369218.00	3760809.50	0.01236	369228.00	3760809.50	0.01179
369238.00	3760809.50	0.01125	369248.00	3760809.50	0.01074
369258.00	3760809.50	0.01026	369268.00	3760809.50	0.00980
369178.00	3760819.50	0.01623	369188.00	3760819.50	0.01583
369198.00	3760819.50	0.01531	369208.00	3760819.50	0.01469
369218.00	3760819.50	0.01403	369228.00	3760819.50	0.01336
369238.00	3760819.50	0.01271	369248.00	3760819.50	0.01211
369258.00	3760819.50	0.01154	369268.00	3760819.50	0.01100
369278.00	3760819.50	0.01048	369288.00	3760819.50	0.00998
369178.00	3760829.50	0.01857	369188.00	3760829.50	0.01814
369198.00	3760829.50	0.01754	369208.00	3760829.50	0.01682
369218.00	3760829.50	0.01604	369228.00	3760829.50	0.01524
369238.00	3760829.50	0.01447	369248.00	3760829.50	0.01374
369258.00	3760829.50	0.01306	369268.00	3760829.50	0.01241
369278.00	3760829.50	0.01179	369288.00	3760829.50	0.01117
369298.00	3760829.50	0.01057	369308.00	3760829.50	0.00998
369178.00	3760839.50	0.02142	369188.00	3760839.50	0.02095
369198.00	3760839.50	0.02027	369208.00	3760839.50	0.01943
369218.00	3760839.50	0.01850	369228.00	3760839.50	0.01754
369238.00	3760839.50	0.01661	369248.00	3760839.50	0.01572
369258.00	3760839.50	0.01489	369268.00	3760839.50	0.01410
369278.00	3760839.50	0.01333	369288.00	3760839.50	0.01258
369298.00	3760839.50	0.01183	369308.00	3760839.50	0.01111
369318.00	3760839.50	0.01041	369328.00	3760839.50	0.00973
369168.00	3760849.50	0.02517	369178.00	3760849.50	0.02494
369188.00	3760849.50	0.02444	369198.00	3760849.50	0.02366
369208.00	3760849.50	0.02267	369218.00	3760849.50	0.02154
369228.00	3760849.50	0.02037	369238.00	3760849.50	0.01922
369248.00	3760849.50	0.01813	369258.00	3760849.50	0.01711
369268.00	3760849.50	0.01612	369278.00	3760849.50	0.01516
369288.00	3760849.50	0.01422	369298.00	3760849.50	0.01330
369308.00	3760849.50	0.01241	369318.00	3760849.50	0.01156

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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL
*** INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

		** CONC OF OTHER	IN MICROGRAMS/M**3			
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC	
369328.00	3760849.50	0.01077	369338.00	3760849.50	0.01003	
369168.00	3760859.50	0.02951	369178.00	3760859.50	0.02934	
369188.00	3760859.50	0.02881	369198.00	3760859.50	0.02793	
369208.00	3760859.50	0.02674	369218.00	3760859.50	0.02536	
369228.00	3760859.50	0.02390	369238.00	3760859.50	0.02247	
369248.00	3760859.50	0.02111	369258.00	3760859.50	0.01982	
369268.00	3760859.50	0.01857	369278.00	3760859.50	0.01736	
369288.00	3760859.50	0.01617	369298.00	3760859.50	0.01502	
369308.00	3760859.50	0.01393	369318.00	3760859.50	0.01290	
369328.00	3760859.50	0.01197	369178.00	3760869.50	0.03493	
369188.00	3760869.50	0.03440	369198.00	3760869.50	0.03338	
369208.00	3760869.50	0.03194	369218.00	3760869.50	0.03022	
369228.00	3760869.50	0.02839	369238.00	3760869.50	0.02657	
369248.00	3760869.50	0.02482	369258.00	3760869.50	0.02316	
369268.00	3760869.50	0.02155	369278.00	3760869.50	0.01999	
369288.00	3760869.50	0.01848	369298.00	3760869.50	0.01704	
369308.00	3760869.50	0.01571	369318.00	3760869.50	0.01449	
369328.00	3760869.50	0.01342	369198.00	3760879.50	0.04050	
369208.00	3760879.50	0.03874	369218.00	3760879.50	0.03656	
369228.00	3760879.50	0.03418	369238.00	3760879.50	0.03181	
369248.00	3760879.50	0.02952	369258.00	3760879.50	0.02733	
369268.00	3760879.50	0.02522	369278.00	3760879.50	0.02319	
369288.00	3760879.50	0.02126	369298.00	3760879.50	0.01947	
369308.00	3760879.50	0.01787	369318.00	3760879.50	0.01646	
369218.00	3760889.50	0.04498	369228.00	3760889.50	0.04183	
369238.00	3760889.50	0.03864	369248.00	3760889.50	0.03556	
369258.00	3760889.50	0.03261	369268.00	3760889.50	0.02978	

369278.00	3760889.50	0.02712	369288.00	3760889.50	0.02468
369298.00	3760889.50	0.02251	369308.00	3760889.50	0.02064
369318.00	3760889.50	0.01909	369238.00	3760899.50	0.04775
369248.00	3760899.50	0.04345	369258.00	3760899.50	0.03938
369268.00	3760899.50	0.03557	369278.00	3760899.50	0.03212
369288.00	3760899.50	0.02912	369298.00	3760899.50	0.02661
369308.00	3760899.50	0.02457	369248.00	3760909.50	0.05405
369258.00	3760909.50	0.04836	369268.00	3760909.50	0.04332
369278.00	3760909.50	0.03904	369288.00	3760909.50	0.03558
369298.00	3760909.50	0.03287	369308.00	3760909.50	0.03077
369268.00	3760919.50	0.05513	369278.00	3760919.50	0.05019
369288.00	3760919.50	0.04643	369298.00	3760919.50	0.04357
369288.00	3760929.50	0.06648	369298.00	3760929.50	0.06270

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*** MODELOPTS: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE PERIOD (43848 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: CON
 *** INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

		** CONC OF OTHER	IN MICROGRAMS/M**3		**
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
369198.00	3760779.50	0.00952	369208.00	3760779.50	0.00916
369198.00	3760789.50	0.01062	369208.00	3760789.50	0.01021
369218.00	3760789.50	0.00979	369228.00	3760789.50	0.00937
369188.00	3760799.50	0.01233	369198.00	3760799.50	0.01192
369208.00	3760799.50	0.01145	369218.00	3760799.50	0.01097
369228.00	3760799.50	0.01048	369238.00	3760799.50	0.01002
369248.00	3760799.50	0.00958	369188.00	3760809.50	0.01393
369198.00	3760809.50	0.01346	369208.00	3760809.50	0.01293
369218.00	3760809.50	0.01236	369228.00	3760809.50	0.01179
369238.00	3760809.50	0.01125	369248.00	3760809.50	0.01074
369258.00	3760809.50	0.01026	369268.00	3760809.50	0.00980
369178.00	3760819.50	0.01623	369188.00	3760819.50	0.01583

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

		** CONC OF OTHER	IN MICROGRAMS/M**3		**
X-COORD (M)	Y-COORD (M)	CONC	X-COORD (M)	Y-COORD (M)	CONC
369328.00	3760849.50	0.01077	369338.00	3760849.50	0.01003
369168.00	3760859.50	0.02951	369178.00	3760859.50	0.02934
369188.00	3760859.50	0.02881	369198.00	3760859.50	0.02793
369208.00	3760859.50	0.02674	369218.00	3760859.50	0.02536
369228.00	3760859.50	0.02390	369238.00	3760859.50	0.02247
369248.00	3760859.50	0.02111	369258.00	3760859.50	0.01982
369268.00	3760859.50	0.01857	369278.00	3760859.50	0.01736
369288.00	3760859.50	0.01617	369298.00	3760859.50	0.01502
369308.00	3760859.50	0.01393	369318.00	3760859.50	0.01290
369328.00	3760859.50	0.01197	369178.00	3760869.50	0.03493
369188.00	3760869.50	0.03440	369198.00	3760869.50	0.03338
369208.00	3760869.50	0.03194	369218.00	3760869.50	0.03022
369228.00	3760869.50	0.02839	369238.00	3760869.50	0.02657
369248.00	3760869.50	0.02482	369258.00	3760869.50	0.02316
369268.00	3760869.50	0.02155	369278.00	3760869.50	0.01999
369288.00	3760869.50	0.01848	369298.00	3760869.50	0.01704
369308.00	3760869.50	0.01571	369318.00	3760869.50	0.01449
369328.00	3760869.50	0.01342	369198.00	3760879.50	0.04050
369208.00	3760879.50	0.03874	369218.00	3760879.50	0.03656
369228.00	3760879.50	0.03418	369238.00	3760879.50	0.03181
369248.00	3760879.50	0.02952	369258.00	3760879.50	0.02733
369268.00	3760879.50	0.02522	369278.00	3760879.50	0.02319
369288.00	3760879.50	0.02126	369298.00	3760879.50	0.01947
369308.00	3760879.50	0.01787	369318.00	3760879.50	0.01646
369218.00	3760889.50	0.04498	369228.00	3760889.50	0.04183
369238.00	3760889.50	0.03864	369248.00	3760889.50	0.03556
369258.00	3760889.50	0.03261	369268.00	3760889.50	0.02978
369278.00	3760889.50	0.02712	369288.00	3760889.50	0.02468
369298.00	3760889.50	0.02251	369308.00	3760889.50	0.02064
369318.00	3760889.50	0.01909	369238.00	3760899.50	0.04775
369248.00	3760899.50	0.04345	369258.00	3760899.50	0.03938

369268.00	3760899.50	0.03557	369278.00	3760899.50	0.03212
369288.00	3760899.50	0.02912	369298.00	3760899.50	0.02661
369308.00	3760899.50	0.02457	369248.00	3760909.50	0.05405
369258.00	3760909.50	0.04836	369268.00	3760909.50	0.04332
369278.00	3760909.50	0.03904	369288.00	3760909.50	0.03558
369298.00	3760909.50	0.03287	369308.00	3760909.50	0.03077
369268.00	3760919.50	0.05513	369278.00	3760919.50	0.05019
369288.00	3760919.50	0.04643	369298.00	3760919.50	0.04357
369288.00	3760929.50	0.06648	369298.00	3760929.50	0.06270

^ *** AERMOD - VERSION 22112 *** *** New Beatrice Center ***
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 *** AERMET - VERSION 16216 *** *** DPM From Construction ***
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*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL

INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

X-COORD (M)		Y-COORD (M)		CONC (YMMDDHH)		X-COORD (M)		Y-COORD (M)		CONC	
(YYMMDDHH)											
369198.00	3760779.50	6.06552	(12010508)	369208.00	3760779.50	5.33206					
(12010508)											
369198.00	3760789.50	6.53634	(12010508)	369208.00	3760789.50	5.76756					
(12010508)											
369218.00	3760789.50	5.66090	(14012708)	369228.00	3760789.50	6.43872					
(14012708)											
369188.00	3760799.50	7.43206	(12010508)	369198.00	3760799.50	7.05857					
(12010508)											
369208.00	3760799.50	6.25617	(12010508)	369218.00	3760799.50	6.09258					
(14012708)											
369228.00	3760799.50	6.92454	(14012708)	369238.00	3760799.50	7.33382					
(14012708)											
369248.00	3760799.50	7.24885	(14012708)	369188.00	3760809.50	7.96291					
(12010508)											
369198.00	3760809.50	7.63895	(12010508)	369208.00	3760809.50	6.80649					
(12010508)											
369218.00	3760809.50	6.57748	(14012708)	369228.00	3760809.50	7.46766					
(14012708)											
369238.00	3760809.50	7.86111	(14012708)	369248.00	3760809.50	7.68623					
(14012708)											
369258.00	3760809.50	6.99598	(14012708)	369268.00	3760809.50	5.94388					
(14012708)											
369178.00	3760819.50	8.15132	(12010508)	369188.00	3760819.50	8.53701					
(12010508)											
369198.00	3760819.50	8.28503	(12010508)	369208.00	3760819.50	7.42878					
(12010508)											
369218.00	3760819.50	7.12476	(14012708)	369228.00	3760819.50	8.07712					
(14012708)											
369238.00	3760819.50	8.44266	(14012708)	369248.00	3760819.50	8.15307					
(14012708)											
369258.00	3760819.50	7.29318	(14012708)	369268.00	3760819.50	6.06249					

(14012708)							
369278.00	3760819.50	4.70177	(14012708)	369288.00	3760819.50	3.83160	
(15020208)							
369178.00	3760829.50	8.57878	(12010508)	369188.00	3760829.50	9.15541	
(12010508)							
369198.00	3760829.50	9.00515	(12010508)	369208.00	3760829.50	8.13533	
(12010508)							
369218.00	3760829.50	7.74558	(14012708)	369228.00	3760829.50	8.76367	
(14012708)							
369238.00	3760829.50	9.08466	(14012708)	369248.00	3760829.50	8.64885	
(14012708)							
369258.00	3760829.50	7.58517	(14012708)	369268.00	3760829.50	6.15135	
(14012708)							
369278.00	3760829.50	4.63533	(14012708)	369288.00	3760829.50	4.56653	
(15020208)							
369298.00	3760829.50	5.17373	(15020208)	369308.00	3760829.50	5.52515	
(15020208)							
369178.00	3760839.50	9.18539	(12020308)	369188.00	3760839.50	9.81745	
(12010508)							
369198.00	3760839.50	9.80833	(12010508)	369208.00	3760839.50	8.94088	
(12010508)							
369218.00	3760839.50	8.45365	(14012708)	369228.00	3760839.50	9.54008	
(14012708)							
369238.00	3760839.50	9.79360	(14012708)	369248.00	3760839.50	9.17149	
(14012708)							
369258.00	3760839.50	7.86354	(14012708)	369268.00	3760839.50	6.20078	
(14012708)							
369278.00	3760839.50	4.59446	(15020208)	369288.00	3760839.50	5.38917	
(15020208)							
369298.00	3760839.50	5.90534	(15020208)	369308.00	3760839.50	6.09389	
(15020208)							
369318.00	3760839.50	5.96542	(15020208)	369328.00	3760839.50	5.57587	
(15020208)							
369168.00	3760849.50	9.71616	(14122308)	369178.00	3760849.50	9.99192	
(12020308)							
369188.00	3760849.50	10.51984	(12010508)	369198.00	3760849.50	10.70390	
(12010508)							
369208.00	3760849.50	9.86306	(12010508)	369218.00	3760849.50	9.26592	
(14012708)							
369228.00	3760849.50	10.42153	(14012708)	369238.00	3760849.50	10.57598	
(14012708)							
369248.00	3760849.50	9.71659	(14012708)	369258.00	3760849.50	8.11692	
(14012708)							
369268.00	3760849.50	6.19939	(14012708)	369278.00	3760849.50	5.54770	
(15020208)							
369288.00	3760849.50	6.27815	(15020208)	369298.00	3760849.50	6.62786	
(15020208)							
369308.00	3760849.50	6.58535	(15020208)	369318.00	3760849.50	6.20686	
(15020208)							

▲ *** AERMOD - VERSION 22112 *** *** New Beatrice Center ***
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 *** AERMET - VERSION 16216 *** *** DPM From Construction ***
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*** MODELOPTs: RegDFault CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL

INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) Y-COORD (M) CONC (YYMMDDHH) X-COORD (M) Y-COORD (M) CONC
 (YYMMDDHH)

369328.00 (15020208)	3760849.50	5.58821	(15020208)	369338.00	3760849.50	4.83549
369168.00 (12020308)	3760859.50	10.52010	(14122308)	369178.00	3760859.50	10.81310
369188.00 (12010508)	3760859.50	11.25511	(12010508)	369198.00	3760859.50	11.70087
369208.00 (14012708)	3760859.50	10.92291	(12010508)	369218.00	3760859.50	10.20341
369228.00 (14012708)	3760859.50	11.42593	(14012708)	369238.00	3760859.50	11.43770
369248.00 (14012708)	3760859.50	10.27629	(14012708)	369258.00	3760859.50	8.33023
369268.00 (15020208)	3760859.50	6.13437	(14012708)	369278.00	3760859.50	6.61765
369288.00 (15020208)	3760859.50	7.19159	(15020208)	369298.00	3760859.50	7.28315
369308.00 (15020208)	3760859.50	6.94030	(15020208)	369318.00	3760859.50	6.27599
369328.00 (12020308)	3760859.50	5.42562	(15020208)	369178.00	3760869.50	11.61589
369188.00 (12010508)	3760869.50	12.00954	(12010508)	369198.00	3760869.50	12.80670
369208.00 (14012708)	3760869.50	12.14525	(12010508)	369218.00	3760869.50	11.29234
369228.00 (14012708)	3760869.50	12.57425	(14012708)	369238.00	3760869.50	12.38303
369248.00 (14012708)	3760869.50	10.83775	(14012708)	369258.00	3760869.50	8.48407
369268.00 (15020208)	3760869.50	6.88326	(15020208)	369278.00	3760869.50	7.76454
369288.00 (15020208)	3760869.50	8.06075	(15020208)	369298.00	3760869.50	7.79401
369308.00 (15020208)	3760869.50	7.09278	(15020208)	369318.00	3760869.50	6.13039
369328.00 (12010508)	3760869.50	5.07226	(15020208)	369198.00	3760879.50	14.02514
369208.00 (14012708)	3760879.50	13.55888	(12010508)	369218.00	3760879.50	12.56550
369228.00 (14012708)	3760879.50	13.89057	(14012708)	369238.00	3760879.50	13.41292
369248.00 (14012708)	3760879.50	11.38118	(14012708)	369258.00	3760879.50	8.55432
369268.00 (15020208)	3760879.50	8.30804	(15020208)	369278.00	3760879.50	8.91097
369288.00 (15020208)	3760879.50	8.78618	(15020208)	369298.00	3760879.50	8.06879
369308.00 (15020208)	3760879.50	6.98002	(15020208)	369318.00	3760879.50	5.74340
369218.00 (14012708)	3760889.50	14.06395	(14012708)	369228.00	3760889.50	15.40167
369238.00 (14012708)	3760889.50	14.52220	(14012708)	369248.00	3760889.50	11.87743
369258.00 (15020208)	3760889.50	8.75561	(15020208)	369268.00	3760889.50	9.80858
369278.00 (15020208)	3760889.50	9.93145	(15020208)	369288.00	3760889.50	9.24059
369298.00 (15020208)	3760889.50	8.01417	(15020208)	369308.00	3760889.50	6.55808
369318.00 (14012708)	3760889.50	6.45160	(14012008)	369238.00	3760899.50	15.69536
369248.00 (15020208)	3760899.50	12.28547	(14012708)	369258.00	3760899.50	10.69537
369268.00 (15020208)	3760899.50	11.23229	(15020208)	369278.00	3760899.50	10.65005
369288.00 (15020208)	3760899.50	9.28465	(15020208)	369298.00	3760899.50	7.55845
369308.00 (14012708)	3760899.50	7.82802	(14012008)	369248.00	3760909.50	12.55084
369258.00	3760909.50	12.66130	(15020208)	369268.00	3760909.50	12.33891

(15020208)
 369278.00 3760909.50 10.85786 (15020208) 369288.00 3760909.50 8.80149
 (15020208)
 369298.00 3760909.50 9.59367 (14012008) 369308.00 3760909.50 10.15693
 (14012008)
 369268.00 3760919.50 12.81473 (15020208) 369278.00 3760919.50 10.87567
 (14012008)
 369288.00 3760919.50 11.87299 (14012008) 369298.00 3760919.50 12.29548
 (14012008)
 369288.00 3760929.50 14.91954 (14012008) 369298.00 3760929.50 14.39795
 (14012008)
 *** AERMOD - VERSION 22112 *** *** New Beatrice Center ***
 02/28/25
 *** AERMET - VERSION 16216 *** *** DPM From Construction ***
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*** MODELOPTS: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: CON

INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

		** CONC OF OTHER		IN MICROGRAMS/M**3			
X-COORD (M)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC	
(YYMMDDHH)							
369198.00	3760779.50	6.06552	(12010508)	369208.00	3760779.50	5.33206	
(12010508)							
369198.00	3760789.50	6.53634	(12010508)	369208.00	3760789.50	5.76756	
(12010508)							
369218.00	3760789.50	5.66090	(14012708)	369228.00	3760789.50	6.43872	
(14012708)							
369188.00	3760799.50	7.43206	(12010508)	369198.00	3760799.50	7.05857	
(12010508)							
369208.00	3760799.50	6.25617	(12010508)	369218.00	3760799.50	6.09258	
(14012708)							
369228.00	3760799.50	6.92454	(14012708)	369238.00	3760799.50	7.33382	
(14012708)							
369248.00	3760799.50	7.24885	(14012708)	369188.00	3760809.50	7.96291	
(12010508)							
369198.00	3760809.50	7.63895	(12010508)	369208.00	3760809.50	6.80649	
(12010508)							
369218.00	3760809.50	6.57748	(14012708)	369228.00	3760809.50	7.46766	
(14012708)							
369238.00	3760809.50	7.86111	(14012708)	369248.00	3760809.50	7.68623	
(14012708)							
369258.00	3760809.50	6.99598	(14012708)	369268.00	3760809.50	5.94388	
(14012708)							
369178.00	3760819.50	8.15132	(12010508)	369188.00	3760819.50	8.53701	
(12010508)							
369198.00	3760819.50	8.28503	(12010508)	369208.00	3760819.50	7.42878	
(12010508)							
369218.00	3760819.50	7.12476	(14012708)	369228.00	3760819.50	8.07712	
(14012708)							
369238.00	3760819.50	8.44266	(14012708)	369248.00	3760819.50	8.15307	
(14012708)							
369258.00	3760819.50	7.29318	(14012708)	369268.00	3760819.50	6.06249	
(14012708)							
369278.00	3760819.50	4.70177	(14012708)	369288.00	3760819.50	3.83160	
(15020208)							
369178.00	3760829.50	8.57878	(12010508)	369188.00	3760829.50	9.15541	
(12010508)							
369198.00	3760829.50	9.00515	(12010508)	369208.00	3760829.50	8.13533	
(12010508)							

369218.00	3760829.50	7.74558	(14012708)	369228.00	3760829.50	8.76367
(14012708)						
369238.00	3760829.50	9.08466	(14012708)	369248.00	3760829.50	8.64885
(14012708)						
369258.00	3760829.50	7.58517	(14012708)	369268.00	3760829.50	6.15135
(14012708)						
369278.00	3760829.50	4.63533	(14012708)	369288.00	3760829.50	4.56653
(15020208)						
369298.00	3760829.50	5.17373	(15020208)	369308.00	3760829.50	5.52515
(15020208)						
369178.00	3760839.50	9.18539	(12020308)	369188.00	3760839.50	9.81745
(12010508)						
369198.00	3760839.50	9.80833	(12010508)	369208.00	3760839.50	8.94088
(12010508)						
369218.00	3760839.50	8.45365	(14012708)	369228.00	3760839.50	9.54008
(14012708)						
369238.00	3760839.50	9.79360	(14012708)	369248.00	3760839.50	9.17149
(14012708)						
369258.00	3760839.50	7.86354	(14012708)	369268.00	3760839.50	6.20078
(14012708)						
369278.00	3760839.50	4.59446	(15020208)	369288.00	3760839.50	5.38917
(15020208)						
369298.00	3760839.50	5.90534	(15020208)	369308.00	3760839.50	6.09389
(15020208)						
369318.00	3760839.50	5.96542	(15020208)	369328.00	3760839.50	5.57587
(15020208)						
369168.00	3760849.50	9.71616	(14122308)	369178.00	3760849.50	9.99192
(12020308)						
369188.00	3760849.50	10.51984	(12010508)	369198.00	3760849.50	10.70390
(12010508)						
369208.00	3760849.50	9.86306	(12010508)	369218.00	3760849.50	9.26592
(14012708)						
369228.00	3760849.50	10.42153	(14012708)	369238.00	3760849.50	10.57598
(14012708)						
369248.00	3760849.50	9.71659	(14012708)	369258.00	3760849.50	8.11692
(14012708)						
369268.00	3760849.50	6.19939	(14012708)	369278.00	3760849.50	5.54770
(15020208)						
369288.00	3760849.50	6.27815	(15020208)	369298.00	3760849.50	6.62786
(15020208)						
369308.00	3760849.50	6.58535	(15020208)	369318.00	3760849.50	6.20686
(15020208)						

*** AERMOD - VERSION 22112 *** *** New Beatrice Center ***
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 *** AERMET - VERSION 16216 *** *** DPM From Construction ***
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*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE 1ST HIGHEST 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: CON

 INCLUDING SOURCE(S): YUNCG001 ,

*** DISCRETE CARTESIAN RECEPTOR POINTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

X-COORD (M) (YYMMDDHH)	Y-COORD (M)	CONC	(YYMMDDHH)	X-COORD (M)	Y-COORD (M)	CONC
369328.00	3760849.50	5.58821	(15020208)	369338.00	3760849.50	4.83549
(15020208)						
369168.00	3760859.50	10.52010	(14122308)	369178.00	3760859.50	10.81310
(12020308)						
369188.00	3760859.50	11.25511	(12010508)	369198.00	3760859.50	11.70087
(12010508)						
369208.00	3760859.50	10.92291	(12010508)	369218.00	3760859.50	10.20341

(14012708)	369228.00	3760859.50	11.42593	(14012708)	369238.00	3760859.50	11.43770
(14012708)	369248.00	3760859.50	10.27629	(14012708)	369258.00	3760859.50	8.33023
(14012708)	369268.00	3760859.50	6.13437	(14012708)	369278.00	3760859.50	6.61765
(15020208)	369288.00	3760859.50	7.19159	(15020208)	369298.00	3760859.50	7.28315
(15020208)	369308.00	3760859.50	6.94030	(15020208)	369318.00	3760859.50	6.27599
(15020208)	369328.00	3760859.50	5.42562	(15020208)	369178.00	3760869.50	11.61589
(12020308)	369188.00	3760869.50	12.00954	(12010508)	369198.00	3760869.50	12.80670
(12010508)	369208.00	3760869.50	12.14525	(12010508)	369218.00	3760869.50	11.29234
(14012708)	369228.00	3760869.50	12.57425	(14012708)	369238.00	3760869.50	12.38303
(14012708)	369248.00	3760869.50	10.83775	(14012708)	369258.00	3760869.50	8.48407
(14012708)	369268.00	3760869.50	6.88326	(15020208)	369278.00	3760869.50	7.76454
(15020208)	369288.00	3760869.50	8.06075	(15020208)	369298.00	3760869.50	7.79401
(15020208)	369308.00	3760869.50	7.09278	(15020208)	369318.00	3760869.50	6.13039
(15020208)	369328.00	3760869.50	5.07226	(15020208)	369198.00	3760879.50	14.02514
(12010508)	369208.00	3760879.50	13.55888	(12010508)	369218.00	3760879.50	12.56550
(14012708)	369228.00	3760879.50	13.89057	(14012708)	369238.00	3760879.50	13.41292
(14012708)	369248.00	3760879.50	11.38118	(14012708)	369258.00	3760879.50	8.55432
(14012708)	369268.00	3760879.50	8.30804	(15020208)	369278.00	3760879.50	8.91097
(15020208)	369288.00	3760879.50	8.78618	(15020208)	369298.00	3760879.50	8.06879
(15020208)	369308.00	3760879.50	6.98002	(15020208)	369318.00	3760879.50	5.74340
(15020208)	369218.00	3760889.50	14.06395	(14012708)	369228.00	3760889.50	15.40167
(14012708)	369238.00	3760889.50	14.52220	(14012708)	369248.00	3760889.50	11.87743
(14012708)	369258.00	3760889.50	8.75561	(15020208)	369268.00	3760889.50	9.80858
(15020208)	369278.00	3760889.50	9.93145	(15020208)	369288.00	3760889.50	9.24059
(15020208)	369298.00	3760889.50	8.01417	(15020208)	369308.00	3760889.50	6.55808
(15020208)	369318.00	3760889.50	6.45160	(14012008)	369238.00	3760899.50	15.69536
(14012708)	369248.00	3760899.50	12.28547	(14012708)	369258.00	3760899.50	10.69537
(15020208)	369268.00	3760899.50	11.23229	(15020208)	369278.00	3760899.50	10.65005
(15020208)	369288.00	3760899.50	9.28465	(15020208)	369298.00	3760899.50	7.55845
(15020208)	369308.00	3760899.50	7.82802	(14012008)	369248.00	3760909.50	12.55084
(14012708)	369258.00	3760909.50	12.66130	(15020208)	369268.00	3760909.50	12.33891
(15020208)	369278.00	3760909.50	10.85786	(15020208)	369288.00	3760909.50	8.80149
(15020208)	369298.00	3760909.50	9.59367	(14012008)	369308.00	3760909.50	10.15693
(14012008)	369268.00	3760919.50	12.81473	(15020208)	369278.00	3760919.50	10.87567
(14012008)							

369288.00 3760919.50 11.87299 (14012008) 369298.00 3760919.50 12.29548
 (14012008)
 369288.00 3760929.50 14.91954 (14012008) 369298.00 3760929.50 14.39795
 (14012008)
 *** AERMOD - VERSION 22112 *** ** New Beatrice Center ***
 02/28/25
 *** AERMET - VERSION 16216 *** ** DPM From Construction ***
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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
 *** THE MAXIMUM 1 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL

 INCLUDING SOURCE(S): YUNCG001 ,
 ** CONC OF OTHER IN MICROGRAMS/M**3 **

RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE	RANK	CONC	(YYMMDDHH) AT	RECEPTOR
1.	15.69536	(14012708) AT (369238.00, 3760899.50) DC				

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR

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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
 *** THE MAXIMUM 1 1-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: CON

 INCLUDING SOURCE(S): YUNCG001 ,
 ** CONC OF OTHER IN MICROGRAMS/M**3 **

RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE	RANK	CONC	(YYMMDDHH) AT	RECEPTOR
1.	15.69536	(14012708) AT (369238.00, 3760899.50) DC				

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR

*** AERMOD - VERSION 22112 *** ** New Beatrice Center ***
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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*
 *** THE SUMMARY OF MAXIMUM PERIOD (43848 HRS) RESULTS ***
 ** CONC OF OTHER IN MICROGRAMS/M**3 **

NETWORK
 GROUP ID AVERAGE CONC RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG) OF TYPE
 GRID-ID

ALL 1ST HIGHEST VALUE IS 0.06648 AT (369288.00, 3760929.50, 4.27, 4.27, 0.00) DC
 2ND HIGHEST VALUE IS 0.06270 AT (369298.00, 3760929.50, 4.27, 4.27, 0.00) DC
 3RD HIGHEST VALUE IS 0.05513 AT (369268.00, 3760919.50, 4.27, 4.27, 0.00) DC
 4TH HIGHEST VALUE IS 0.05405 AT (369248.00, 3760909.50, 4.27, 4.27, 0.00) DC
 5TH HIGHEST VALUE IS 0.05019 AT (369278.00, 3760919.50, 4.27, 4.27, 0.00) DC
 6TH HIGHEST VALUE IS 0.04836 AT (369258.00, 3760909.50, 4.27, 4.27, 0.00) DC
 7TH HIGHEST VALUE IS 0.04775 AT (369238.00, 3760899.50, 4.27, 4.27, 0.00) DC
 8TH HIGHEST VALUE IS 0.04643 AT (369288.00, 3760919.50, 4.27, 4.27, 0.00) DC
 9TH HIGHEST VALUE IS 0.04498 AT (369218.00, 3760889.50, 4.27, 4.27, 0.00) DC
 10TH HIGHEST VALUE IS 0.04357 AT (369298.00, 3760919.50, 4.27, 4.27, 0.00) DC

CON 1ST HIGHEST VALUE IS 0.06648 AT (369288.00, 3760929.50, 4.27, 4.27, 0.00) DC
 2ND HIGHEST VALUE IS 0.06270 AT (369298.00, 3760929.50, 4.27, 4.27, 0.00) DC
 3RD HIGHEST VALUE IS 0.05513 AT (369268.00, 3760919.50, 4.27, 4.27, 0.00) DC
 4TH HIGHEST VALUE IS 0.05405 AT (369248.00, 3760909.50, 4.27, 4.27, 0.00) DC
 5TH HIGHEST VALUE IS 0.05019 AT (369278.00, 3760919.50, 4.27, 4.27, 0.00) DC
 6TH HIGHEST VALUE IS 0.04836 AT (369258.00, 3760909.50, 4.27, 4.27, 0.00) DC
 7TH HIGHEST VALUE IS 0.04775 AT (369238.00, 3760899.50, 4.27, 4.27, 0.00) DC
 8TH HIGHEST VALUE IS 0.04643 AT (369288.00, 3760919.50, 4.27, 4.27, 0.00) DC
 9TH HIGHEST VALUE IS 0.04498 AT (369218.00, 3760889.50, 4.27, 4.27, 0.00) DC
 10TH HIGHEST VALUE IS 0.04357 AT (369298.00, 3760919.50, 4.27, 4.27, 0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR

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*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE SUMMARY OF HIGHEST 1-HR RESULTS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

DATE

NETWORK
 GROUP ID OF TYPE GRID-ID AVERAGE CONC (YMMDDHH) RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)

ALL HIGH 1ST HIGH VALUE IS 15.69536 ON 14012708: AT (369238.00, 3760899.50, 4.27, 4.27,
0.00) DC
CON HIGH 1ST HIGH VALUE IS 15.69536 ON 14012708: AT (369238.00, 3760899.50, 4.27, 4.27,
0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

▲ *** AERMOD - VERSION 22112 *** *** New Beatrice Center ***
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*** AERMET - VERSION 16216 *** *** DPM From Construction ***
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*** MODELOPTS: RegDFault CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 7 Warning Message(s)
A Total of 718 Informational Message(s)
A Total of 43848 Hours Were Processed
A Total of 458 Calm Hours Identified
A Total of 260 Missing Hours Identified (0.59 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****

CO W320	11	URBOPT: Input Parameter May Be Out-of-Range for Parameter	URB-POP
ME W186	360	MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used	0.50
ME W187	360	MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET	
OU W565	366	OUPLOT: Possible Conflict With Dynamically Allocated FUNIT	PLOTFILE
OU W565	367	OUPLOT: Possible Conflict With Dynamically Allocated FUNIT	PLOTFILE
OU W565	368	PERPLT: Possible Conflict With Dynamically Allocated FUNIT	PLOTFILE
OU W565	369	PERPLT: Possible Conflict With Dynamically Allocated FUNIT	PLOTFILE

*** AERMOD Finishes Successfully ***
