

Communication from Public

Name: Seth Wulkan
Date Submitted: 11/29/2021 09:09 AM
Council File No: 21-0593-S1
Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 1 of 20.



CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
CITY HALL 200 NORTH SPRING STREET LOS ANGELES CA 90012

Categorical Exemption

825 Holt Project

Case Number: ENV-2020-2165-EAF

Project Location: 825-837 Holt Avenue, Los Angeles, CA 90035

Community Plan Area: Wilshire

Council District: 5 – Koretz

Project Description: The Project Site is located on the west side of Holt Avenue, midblock between Gregory Way and Chalmers Drive, in the Wilshire Community Plan of the City of Los Angeles, 90035 in the County of Los Angeles. The Site currently contains three 2-story duplexes on three separate, contiguous lots. The 3 buildings have a total of 10,617 square feet. The buildings would be removed. The Project proposes the construction, use, and maintenance of an approximately 56,796 square-foot, 5-story building for an Eldercare Facility development consisting of 80 guest rooms (and a total of 94 beds), of which 62 guest rooms will be designated for Assisted Living Care (with a total of 72 beds) and 18 guest rooms will be designated for Alzheimer's/dementia memory care (with a total of 22 beds). The City's Eldercare Ordinance allows deviations from applicable base zoning standards so long as certain findings can be made by the City based on evidence in the record. There would be two subterranean levels. The first level would contain common area amenities. The second level would contain underground parking with 36 parking spaces.

Discretionary entitlements, reviews, permits and approvals required to implement the Project will include, but are not necessarily limited to, the following: Eldercare Facilities are permitted by-right in the R3 Zone. In accordance with the provisions of the Eldercare Facility Unified Permit process per LAMC Section 14.3.1, the applicant is seeking an Eldercare Facility with Assisted Living Care and Alzheimer's/Dementia Care Housing within the [Q]R3-1-O Zone, with deviations to allow for: 1) A maximum of 80 guest rooms in lieu of the otherwise permitted 36 guest rooms pursuant to LAMC Section 12.10-C,4. 2) A maximum Floor Area Ratio (FAR) of 5.06:1 in lieu of the otherwise permitted 3:1 FAR pursuant to LAMC Section 12.21.1. 3) A maximum building height of 58 feet in lieu of the otherwise maximum 45 feet pursuant to LAMC Section 12.21.1; 4) A continuous width of the exterior walls fronting Holt Avenue to exceed 40 feet without a change in plane as otherwise required pursuant to Ordinance No. 167,335. 5) A 10-foot front yard in lieu of the otherwise required 20-foot front yard pursuant to Ordinance No. 167,335. 6) 6-foot side yards in lieu of the otherwise required 8-foot side yards pursuant to Ordinance No. 167,335. 7) Waiver of the long-term bicycle parking requirements otherwise required pursuant to LAMC Section 12.21-A,16(a)(2). Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, excavation permits, foundation permits, building permits, and sign permits.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC
9410 Topanga Canyon Boulevard,
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APPLICANT:

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Beverly Hills, CA 90211

November 2021

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Section 1

Project Description

This section is based on the following items, which are included as **Appendix A** to this CE:

A-1 Plans, KTG Architecture, August 10, 2021.

A-2 Landscape Plans, SQLA Landscape Architects, June 29, 2021.

1 Project Information

Project Title: 825 Holt Project

Document Type: Class 32 Categorical Exemption (CE) for new in-fill eldercare facility development (the Project)

Environmental No.: ENV-2020-2165-EAF

Related Case No.: ZA-2020-2164-ELD-SPR

Project Location: 825-837 Holt Avenue, Los Angeles, CA 90035 (Project Site or Site)

Lead Agency: City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 621, Los Angeles, CA 90012

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8665 Wilshire Boulevard, Suite 208, Beverly Hills, CA 90211

Prepared By: CAJA Environmental Services, LLC
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Seth Wulkan, Project Manager, 310-469-6704, seth@ceqa-nepa.com

2 Regulatory Setting

California Environmental Quality Act (CEQA) Guidelines, Article 19 (Categorical Exemptions):

15300. CATEGORICAL EXEMPTIONS

Section 21084 of the Public Resources Code requires these Guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA.

In response to that mandate, the Secretary for Resources has found that the following classes of projects listed in this article do not have a significant effect on the environment, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents.

15300.2. EXCEPTIONS

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

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

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

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

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

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

15332. IN-FILL DEVELOPMENT PROJECTS

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

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

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

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

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

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

3 Environmental Setting

3.1 Project Location

The Project Site is located on the west side of Holt Avenue, midblock between Gregory Way and Chalmers Drive, in the Wilshire Community Plan of the City of Los Angeles (City), 90035 in the County of Los Angeles (County).

The City of Beverly Hills boundary is north of Gregory Way, 275 feet north of the Site and east of Le Doux Road, 350 feet east of the Site.

3.2 Surrounding Land Uses

North adjacent to the Site is a 4-story multi-family residential building (819 Holt Avenue), zoned [Q]R3-1-O.

South adjacent to the Site is a 3-story multi-family residential building (839 Holt Avenue), zoned [Q]R3-1-O.

West adjacent to the Site are three 2-story multi-family duplexes (824, 830, 836 Sherbourne Drive), zoned [Q]R3-1-O.

East across Holt Avenue are three 2-story multi-family residential buildings (824, 830, 834 Holt Avenue), zoned [Q]R3-1-O.

The Margaret Herrick Library (333 La Cienega Boulevard) is 600 feet southeast of the Site.

The nearest school is Pressman Academy School (1055 La Cienega Boulevard), 1,200 feet southwest of the Site.

The nearest potential historic resources are the residential buildings in the Olympic Boulevard Multi-Family Residential District, which appears eligible for the National Register, California Register and local listing.¹ However, it has not been designated a historic resource.² The District is 775 feet south of the Site. These buildings would not be impacted by the Project due to the distance and because of intervening buildings.

¹ Los Angeles Historic Places: <http://historicplacesla.org/reports/bc82bf72-c80d-4b91-b34b-dd2e464bc7c1>

² In *Cassilly v. City of Los Angeles*, Los Angeles Superior Court Case No. 19STCP00586, the court has enjoined the City from continuing to use its SurveyLA historical resource survey to presume historic status for identified properties for purposes of the California Environmental Quality Act ("CEQA") without additional evidence. Specifically, the court found that Zoning Information Nos. 2453, 2454, and 2455, relating to three potential historic districts in Venice identified in SurveyLA, improperly stated that SurveyLA alone was sufficient evidence to confer historical status on contributing properties within the potential district for purposes of CEQA. As such, the City's policy as stated in the subject Zoning Information that demolition of a Contributing building in one of the three potential districts identified in SurveyLA is automatically a significant impact under CEQA, therefore requiring the preparation of an Environmental Impact Report, is inconsistent with the requirements of CEQA.

3.3 Regional and Local Access

Regional access is provided by:

- I-10 (Santa Monica) Freeway on-ramps and off-ramps at La Cienega Avenue, located 1.7 miles south of the Site

Local access is provided by:³

- Holt Avenue (Local Street Standard in the Mobility Plan 2035)
- Chalmers Drive (Local Street Standard)
- Gregory Way (Local Street Standard)
- Sherbourne Drive (Collector)
- Olympic Boulevard (Boulevard II)
- La Cienega Boulevard (Avenue I)

3.4 Bicycle Facilities

The following bicycle-friendly streets are nearby:⁴

- Gregory Way, 230 feet north of the Site
- Bedford Street, 425 feet east of the Site

3.5 Pedestrian Facilities

There are sidewalks along the Project Site's east side on Holt Avenue. Striped crosswalks are provided at all legs of the nearest signalized intersection (Gregory Way / La Cienega Boulevard, 650 feet east of the Site).

3.6 Public Transit

The Site is within a High Quality Transit Area (HQT⁵), which are areas within one-half mile of a high quality transit corridor, which is a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.⁶ Los Angeles County Metropolitan

³ NavigateLA, Mobility Plan 2035: <https://navigatela.lacity.org/navigatela/>, accessed October 20, 2021.

⁴ According to LADOT's Bike Program, Bicycle Friendly Streets (BFS) facilities parallel major corridors and provide a calmer, safer alternative for bicyclists of all ages and skill levels. BFS are multi-modal streets, which means that they accommodate all neighborhood users from cars, to bikes, to pedestrians. <https://ladotbikeblog.wordpress.com/bfs/>

⁵ SCAG, HQT⁵: <https://gisdata-scag.opendata.arcgis.com/datasets/high-quality-transit-areas-hqta-2016-scag-region?geometry=-121.570%2C33.364%2C-114.731%2C34.954>, accessed October 20, 2021.

⁶ SCAG, Connect SoCal, Active Transportation Technical Report, page 26: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_active-transportation.pdf?1606001530, accessed October 20, 2021.

Transportation Authority (Metro)⁷ and Antelope Valley Transit Authority (AVTA)⁸ operate public transit in the area:

- Metro bus line 105 runs north-south along La Cienega Boulevard and stops at Gregory Way, 650 feet west of the Site. Based on the latest schedule (effective June 27, 2021), the AM and PM peak period headways range from 9-12 minutes.⁹
- Metro bus line 28 runs east-west along Olympic Boulevard and stops at La Cienega Boulevard, 1,045 feet southwest of the Site. Based on the latest schedule (effective September 12, 2021), the AM and PM peak period headways range from 9-15 minutes.¹⁰
- Metro bus line 20 runs east-west along Wilshire Boulevard and stops at La Cienega, 1,260 feet northeast of the Site. Based on the latest schedule (effective September 12, 2021), the AM and PM peak period headways is 15 minutes.¹¹
- Metro bus line Rapid 720 runs east-west along Wilshire Boulevard and stops at La Cienega Boulevard, 1,260 feet northeast of the Site. Based on the latest schedule (effective September 12, 2021), the AM and PM peak period headways is 15 minutes.¹²
- AVTA bus line 786 runs east-west along Wilshire Boulevard and stops at La Cienega Boulevard, 1,260 feet northeast of the Site. Based on the latest schedule, the AM and PM peak period headways ranges from 25-50 minutes.¹³

Metro's D (Purple)¹⁴ Line provides rail service to Downtown Los Angeles and Koreatown. The D Line is undergoing an expansion and a new station at Wilshire/La Cienega, approximately 1,325 feet northwest of the Site, is expected in 2024.¹⁵

3.7 Planning and Zoning

Table 1-1, Project Site, lists the Site's APNs, zoning and General Plan land use designation. The Project Site is zoned and General Plan designated as follows:

- [Q]R3-1-O (Qualified Classification, Multiple Dwelling zone, Height District 1, Oil Dwelling District) and Medium Residential designation.¹⁶
- Ordinance No. 167,335 (effective November 15, 1991) established permanent "Q" Qualified conditions that further regulate development on the property by requiring a minimum

⁷ Metro, Maps: <https://www.metro.net/riding/schedules/>

⁸ Antelope Valley Transit Authority, System Map: <https://www.avta.com/system-map.php>

⁹ Metro Line 105: <https://media.metro.net/documents/1e1822f1-9571-4f2b-8495-4fcc3dd87814.pdf>

¹⁰ Metro Line 28: <https://media.metro.net/documents/f1fc95a2-4754-44bd-8957-3665a19d0ba5.pdf>

¹¹ Metro Line 20: <https://media.metro.net/documents/3be7ef8e-cc21-4ed6-bc98-5c7873524471.pdf>

¹² Metro Line 720: <https://media.metro.net/documents/16d4a73d-d19a-4729-ad3f-9ea76e3cf00e.pdf>

¹³ AVTA 786: <https://www.avta.com/downloads/routes/2021/786-for-web-2021-v2.pdf>

¹⁴ In January 2020, Metro renamed its rail line, and currently has a transitional naming system using both the letter and the color: <https://www.metro.net/projects/line-letters/>

¹⁵ Metro D Line Extension: <https://www.metro.net/projects/westside/>, accessed October 20, 2021.

¹⁶ Los Angeles Zoning Summary: <https://planning.lacity.org/zoning/regulations-summary>

building articulation of 5 feet for a distance of 8 feet between any 40-foot continuous width of any exterior wall facing a public street, a minimum 20-foot front yard setback and minimum 5-foot side yard setbacks.

The Project Site has the following zoning classifications:

- ZI-2452 Transit Priority Area in the City of Los Angeles

The Project Site is identified in ZIMAS as a Transit Oriented Communities (TOC) Tier 3 based on the shortest distance between any point on the lot and a qualified Major Transit Stop at the intersection of Wilshire Boulevard and La Cienega Boulevard, 1,250 northeast of the Site).¹⁷

**Table 1-1
Project Site**

Address	Lot	APN	Size (sf)	Zone	Land Use
825, 827 S. Holt Avenue	40	4333-024-008	6,009.7	[Q]R3-1-O	Medium Residential
829, 831 S. Holt Avenue	41	4333-024-009	6,004.0		
835, 837 S. Holt Avenue	42	4333-024-010	6,004.7		

Source: Zone Information & Map Access System (ZIMAS): <http://zimas.lacity.org>, October 2021.

3.8 Existing Conditions

The Project Site, consisting of three lots, is a level, rectangular-shaped parcel of land with an even width and depth of 150 feet and 120 feet, respectively, and an approximately 150-foot frontage on the west side of Holt Avenue.

The Site area is 18,003 square feet (0.41 acres).¹⁸ The Site currently contains three 2-story duplexes on three separate, contiguous lots. The 3 buildings have a total of 10,617 square feet.¹⁹ The buildings would be removed.

Based on an observation of existing conditions, research related to the history of the property, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument, the buildings do not appear eligible for listing at the federal, state, or local levels.²⁰

The onsite trees and surrounding right-of-way sidewalk (street trees) are summarized in **Table 1-2, Trees**. There are 13 trees (8 onsite and 5 street). The City's Protected Tree Ordinance (Ord. No. 177,404) includes a list of protected trees²¹ and shrubs and provides permitting and

¹⁷ Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The stations or bus routes may be existing, under construction or included in the most recent Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP).

¹⁸ Plans, KTG Architecture, August 10, 2021.

¹⁹ Based on assessor information from <http://zimas.lacity.org>

²⁰ Historical Resources Assessment Report, Historic Resources Group, June 2020.

²¹ LAMC Section 46.01: "PROTECTED TREE" means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: (a)

replacement requirements for such trees.²² The Project Site contains three street trees identified as California Sycamores, which are listed in under the Tree Ordinance as protected.

**Table 1-2
Trees**

#	Location	Species	Protected?	Status
1	Sidewalk	California Sycamore	Yes	To be removed for driveway
2	Onsite	Edible Fig	No	To be removed for new building
3	Sidewalk	California Sycamore	Yes	To remain in place
4	Sidewalk	California Sycamore	Yes	To remain in place
5	Onsite	Juniper	No	To be removed for new building
6	Onsite	Juniper	No	To be removed for new building
7	Onsite	Paperbark Tree	No	To be removed for new building
8	Onsite	Chinese Banyan	No	To be removed for new building
9	Onsite	Paperbark Tree	No	To be removed for new building
10	Onsite	Paperbark Tree	No	To be removed for new building
11	Onsite	Paperbark Tree	No	To be removed for new building
12	Sidewalk	Jacaranda	No	To remain in place
13	Sidewalk	Crape Myrtle	No	To remain in place
Tree Report, Tree and Design, March 11, 2020.				

4. Project Description

4.1 Project Overview

The Project proposes the construction, use, and maintenance of an approximately 56,796 square-foot, 5-story building for an Eldercare Facility development consisting of 80 guest rooms (and a total of 94 beds), of which 62 guest rooms will be designated for Assisted Living Care (with a total of 72 beds) and 18 guest rooms will be designated for Alzheimer's/dementia memory care (with a total of 22 beds). The City's Eldercare Ordinance allows deviations from applicable base zoning standards so long as certain findings can be made by the City based on evidence in the record.

There would be two subterranean levels. The first level would contain common area amenities. The second level would contain underground parking with 36 parking spaces.

4.1.1 Density

See **Table 1-3** for the density calculation. Pursuant to the City's General Plan and Los Angeles Municipal Code (LAMC) Sections 12.14 A.4, 12.13.5 A.1, and 12.11 C.4, the maximum

Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*). (b) Southern California Black Walnut (*Juglans californica* var. *californica*) (c) Western (California) Sycamore (*Platanus racemosa*) (d) California Bay (*Umbellularia californica*) This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.

²² Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

residential density within the R3 zone is one guest room per 500 square feet of lot area.

With a Site area of 18,000.3 square feet, the Project could provide a base density of 36 rooms. The Project requests a deviation from this standard under the City's Eldercare Ordinance (Ord. No. 178,063) to allow an increase in the number of guest rooms to 80.

**Table 1-3
Density**

Zone	Site Area	Rate	Base Density	Provided
R3	18,000 sf	1 room / 500 sf	36	80
LAMC rounds down. Plans, KTG Architecture, August 10, 2021.				

4.1.2 Floor Area

See **Table 1-4** for the floor area and FAR. Height District 1 permits a maximum floor area ratio (FAR) of 3:1. With a buildable area of 11,390 square feet, the Project could provide a floor area of 34,170 square feet. The Project requests a deviation from this standard under the Eldercare Ordinance to allow an increase in the FAR to 4.24:1 (basement level through 5th floor). This would include 56,976 square feet of floor area.

**Table 1-4
Floor Area**

Zone	Buildable Area	LAMC Max		Provided	
		FAR	Floor Area	FAR	Floor Area
R3	11,390 sf	3:1	34,170 sf	4.99:1	56,796 sf
LAMC rounds down. Plans, KTG Architecture, August 10, 2021.					

4.1.3 Setbacks

See **Table 1-5** for the setbacks. The Project requests an allowed deviation under the Eldercare Ordinance from the minimum 10-foot front yard setback, minimum 6-foot side yard setbacks, and the Q Condition requirement to maintain the width of the exterior walls fronting Holt Avenue exceeding 40 feet without the required change in plane.

**Table 1-5
Setbacks**

Location	Required	Provided
Front	20 feet	10 feet
North side	8 feet	6 feet
South side	8 feet	6 feet
Rear	15 feet	15 feet
Plans, KTG Architecture, August 10, 2021.		

4.1.4 Height

The maximum building height and stories is 45 feet.

The Project is requesting a deviation under the Eldercare Ordinance from the maximum height limit by proposing a height of 58 feet.

4.2 Design and Architecture

See **Appendix A** of this CE for floor plans, elevations, sections, and renderings. The Project has been designed as an integrated single structure with articulation and variation consistent with applicable City design guidance. Parking spaces within the building (subterranean levels) and guest rooms located within the building have been integrated into the overall architectural design of the Project.

Along the east-facing frontage of the building, the massing is broken up through the use of changes in plane, with a change in design and material between the ground-level and the upper four levels. Though these changes in plane do not meet the 5-foot depth change for a minimum span of 8 feet standard set by the existing [Q] condition of the zone, but they do offer aesthetic relief in contrast to a single-plane monolithic building façade.

As designed, the proposed Project meets the definition of an “Eldercare Facility,” which requires that it is “one functionally operated facility which provides residential housing for persons 62 years and older, and which combines in one facility, two or more of the following types of uses: Senior Independent Housing, Assisted Living Care Housing, Skilled Nursing Care Housing, and/or Alzheimer’s/Dementia Care Housing. A minimum of 75 percent of the floor area, exclusive of common areas, shall consist of Senior Independent Housing and/or Assisted Living Care Housing.” (Los Angeles Municipal Code (“LAMC”) Section 12.03).

The Property is planned to have two subterranean levels – the first level containing common area amenities, and the second level containing underground parking. The building design maximizes natural light and natural ventilation for the common areas below grade by means of two expansive courtyards that daylight out to the sky.

The ground level is proposed to contain a lobby, mail room, bistro, kitchen main dining area, a dining courtyard, restrooms, 10 Assisting Living guest rooms, and offices for the administrative staff. The second level would be reserved for Alzheimer’s/Memory Care residents, and contain a small elevator lobby, dining room, living room, a wellness office, restroom, activity area, and 18 guest rooms. The third and fourth levels, feature a small elevator lobby, restroom, wellness office, and 19 Assisted Living guest rooms. The fifth level is proposed to contain a small elevator lobby, a dining room, common restrooms, 14 Assisted Living guest rooms, and three separate outdoor patio areas facing the interior and rear of the building.

The building's ground level would incorporate pedestrian scale uses and design, with a street fronting entrance. In addition, the building's proposed design architecturally differentiates the base of the building from the guest rooms above. The upper residential portions of the building incorporate varied articulation including false Juliet balconies on the west, north and south facades.

The building design maximizes natural light and natural ventilation for the primary common areas below grade by means lightwells that open up into courtyards that daylight out to the sky.

The Project is designed with a façade that utilizes a variety of materials, including metal, cement plastering, and glass in order to add visual interest through different textures and colors. This variation, along with insets and offsets, and street-facing windows and glazing at the ground floor, avoids a dull or repetitive façade, and contribute to neighborhood safety by activating the ground floor and putting more “eyes on the street.”

The overall scale of the building is compatible with the surrounding built environment, which includes the following building in the immediate area surrounding the Project Site:

- 4-story residential building at 819 Holt Avenue, adjacent north of the Site;
- 4-story residential building at 820 Sherbourne Drive, adjacent northwest of the Site;
- proposed approved 7-story eldercare facility at 843 Sherbourne Drive, 200 feet southwest of the Site (approved by the City on June 1, 2021).

Therefore, the Project will be compatible with the existing and future developments in the neighborhood.

4.3 Open Space

There is no open space requirement for eldercare guest rooms.

The Project would provide 6,620 square feet of open space, including courtyards, dining courtyards, and upper level patios.

4.4 Landscaping

The Project would provide 3,049.5 square feet of landscaped open space on the basement level, level 1, level 2 memory care patio, and level 5 roof decks.

Various types of vegetation and trees are integrated into the design of the building facades to minimize the visual impact of the building and buffering from neighboring properties. The Project's landscaping creates a pedestrian-friendly ground floor that helps unify and bolster continuity between the neighborhood and the Project Site as a whole along Holt Avenue. Additionally, perimeter landscaping will provide a privacy buffer and screening between the subject development and the adjoining properties.

The Project would provide trees as follows:²³

- 15 trees on the basement level
- 76 trees on the ground level

²³ [Landscape Plans](#), SQLA Landscape Architects, June 29, 2021.

- 3 street trees on Holt Avenue

Trees would be planted on the property (including street trees) subject to the approval by the Street Tree Division, at a ratio of one tree for every 1,000 square feet of lot area. Trees may not be less than 24-inch box in size at the time of planting (Ordinance No. 167,335).²⁴

The Project would comply with LAMC requirements for trees and landscaping.

4.5 Access and Circulation

The Site contains three curb cut on Holt Avenue that provide individual access to each of the three existing duplex buildings.

For the Project, the northernmost curb cut would be slightly relocated south and expanded to accommodate a 24-foot-wide 2-way traffic (entrance/exit) driveway. The remaining two curb cuts would be removed.

The Project's internal circulation and parking plan is designed with a driveway for ingress and egress to minimize congestion and back-up onto the street. All circulation would be contained on site with access to the subterranean parking garage. Moreover, the driveway access and circulation would be subject to review and approval by the Department of Transportation at the time of permitting.

Pedestrian access would be provided from the existing sidewalk along Holt Avenue, which would provide direct access to the ground-floor lobby.

All loading activities shall be conducted on-site or within a designated on-street loading zone adjacent to the Project. Trash and recycling bins would be fully enclosed.

4.6 Vehicle Parking

Table 1-6, Vehicle Parking, provides the amount of required and provided vehicle parking.

**Table 1-6
Vehicle Parking**

Use	Quantity	Rate	Required	Provided
Assisted Living	62 guest rooms	0.5 spaces / room	31	
Memory Care	22 beds	0.2 spaces / bed	5	
Total			36	36
Per LAMC 12.21 A.4(u). <u>Plans</u> , KTG Architecture, August 10, 2021.				

The Project would provide 36 parking spaces (31 spaces for the Assisted Living guest rooms at a ratio of 0.5 spaces per unit and five spaces for the Alzheimer's/Dementia Guest Rooms at a ratio of 0.2 spaces per bed), which complies with the parking required pursuant to LAMC Section 12.21-A,4(u), the standard applicable to Eldercare Facilities. On-site parking is provided

²⁴ Central Los Angeles Area Planning Commission, Letter of Determination, August 26, 2021, Conditions of Approval #9.

entirely within a second level subterranean level. Thus, no vehicular parking would be visible from the street.

4.7 Bicycle Parking

LAMC 12.21.A.16(a) generally requires new residential projects to provide bicycle parking spaces. Short-term bicycle parking are required to be provided with bicycle racks that support the bicycle frame at two points. Long-term bicycle parking must be secured from the general public, enclosed on all sides and protect bicycles from inclement weather.

Table 1-7, Bicycle Parking, provides the amount of required and provided bicycle parking for Eldercare Facilities, which pursuant to LAMC requirements include reduced bicycle parking rates to account for reduced bicycle parking in light of the service population. An Eldercare Facility is required to provide long-term bicycle parking at a ratio of 1 space per 5,000 square feet and required to provide short-term bicycle parking at a ratio of 1 space per 10,000 square feet, pursuant to LAMC Section 12.21-A,16(a)(2). This would require 12 long-term and 6 short-term spaces for a total of 18 bicycle parking spaces.

The Project would not be providing long-term bicycle parking. The Project is requesting a waiver of the long-term bicycle parking requirements.

All required short-term bicycle parking spaces are located in a bicycle storage room on level B1.

A separate men's and women's shower facility shall be provided to support employees that choose to bike to work.

**Table 1-7
Bicycle Parking**

Use	Quantity	Short-Term Spaces			Long-Term Spaces		
		Rate	Required	Provided	Rate	Required	Provided
Institutional	56,796 sf	1 / 10,000	6	6	1 / 5,000	12	0
LAMC Table 12.21 A.16 (a)(2) and Ordinance No. 185,480. A minimum of two short-term bicycle parking spaces shall be provided in all cases. Per LAMC Section 12.21.A.16(b): When the application of these regulations results in the requirement of a fractional bicycle space, any fraction up to and included on-half may be disregarded, and any fraction over one-half shall be construed as requiring one bicycle parking space. Therefore the 2.5 spaces rounds down to 2 spaces. <u>Plans</u> , KTG Architecture, August 10, 2021.							

4.8 Lighting and Signage

Project signage would include building identification, wayfinding, and security markings. Signage would be similar to other signage in the Project's vicinity. No off-site signage is proposed.

Lighting would be designed and installed with shielding, such that the light source would not be able to be seen from adjacent residential properties, the public right-of-way, or from above. Security lighting would be integrated into the overall architecture and landscaping.

The Project would also comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto specified sensitive uses, under the terms of the LAMC Section 93.0117(b).

4.9 Site Security

The Project would provide a security program to ensure the safety of its residents, employees, and visitors. Security features to assist in crime prevention efforts and to reduce the demand for police protection services would include secured building access/design to residential areas; lighting of building entryways and areas; and possible video surveillance. The security program would include controlling access; monitoring entrances and exits of buildings; monitoring fire/life/safety systems; and security lighting.

Caregiver oversight and supervision would be provided to prevent accidents that may occur otherwise. The Alzheimer's/Dementia Care floor would also include an increased staff-to-resident ratio. Additionally, this area of the Project would be more confined and secured as per applicable standards and regulations. The Project would also provide security features including, but not limited to, controlled access to on-site parking areas and building entries, particularly after regular business hours, video surveillance, and security lighting. Such security and resident safety features would also be provided consistent with state Eldercare Facility licensing standards.

4.10 Sustainability Features

The Project would comply with the 2020 Los Angeles Green Building Code (LAGBC, effective January 1, 2020)²⁵ and the 2019 California Green Building Standards Code (CalGreen, effective January 1, 2020).²⁶

All building systems would meet current Title 24 Energy Standards, and the proposed building would be designed to promote better day lighting and air ventilation. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances, reduction of indoor and outdoor water use, weather-based controller and drip irrigation systems, and water-efficient landscape design. In addition, the landscaping on the outdoor decks would serve to help reduce solar heat gain and facilitate stormwater generation on-site. Furthermore, the Project would recycle and reuse building and construction materials to the maximum extent feasible.

The Project would recycle and reuse building and construction materials to the maximum extent feasible.

²⁵ City of Los Angeles Department of Building and Safety, Green Building, available at <http://ladbs.org/forms-publications/forms/green-building>, accessed on July 1, 2021.

²⁶ California Building Codes: <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#@ViewBag.JumpTo>, accessed on July 1, 2021.

The Project's infill location would promote the concentration of development in an urban location with extensive infrastructure and access to public transit facilities. The Project's proximity to public transportation would reduce vehicle miles traveled for employees and visitors.

4.11 Anticipated Construction Schedule

The estimated construction schedule is shown in **Table 1-8, Construction Schedule**.

The Project will demolish 10,617 square feet of residential buildings.

For a conservative assumption, the Project will excavate at a depth of approximately 22 feet for subterranean parking, foundation elements, and grading of soils.²⁷

No fill will be imported to the Site. The amount of materials exported will be up to approximately 14,215 cubic yards.²⁸ Export would be deposited at a landfill in Puente Hills, approximately 30 miles from the Site (one-way).

Truck routes are expected to utilize the most convenient access to freeway ramps. The truck routes would comply with the approved truck routes designated within the City and/or adjacent jurisdictions. Trucks traveling to and from the Project Site must travel along the designated routes. The route will likely include La Cienega Boulevard to the I-10 Freeway.

**Table 1-8
Construction Schedule**

Phase	Duration
Demolition	23 days
Site Preparation	21 days
Grading	22 days
Construction	327 days
Architectural Coatings	88 days

Demolition involves removing buildings or structures.

Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and removing stones and other unwanted material or debris prior to grading.

Grading involves the cut and fill of land to ensure that the proper base and slope is created for the foundation.

Building Construction involves the construction of the foundation, structures and buildings.)

Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures, the painting of parking lot or parking garage striping, associated signage and curbs, and the painting of the walls or other components such as stair railings inside parking structures.

Construction schedule, including start, end, and duration dates are estimates only. Some overlap of phasing may occur.

The analysis assumes that construction would have begun in 2020. In practice, construction could begin at a later time. However, using an earlier start date represents a worst-case scenario for the analysis of construction emissions, because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Estimates provided by the Applicant.

²⁷ Plans, KTG Architecture, August 10, 2021.

²⁸ Estimates provided by the Applicant.

4.12 Discretionary Requests

Eldercare Facilities are permitted by-right in the R3 Zone. In accordance with the provisions of the Eldercare Facility Unified Permit process per LAMC Section 14.3.1, the applicant is seeking an Eldercare Facility with Assisted Living Care and Alzheimer's/Dementia Care Housing within the [Q]R3-1-O Zone, with deviations to allow for:

1. A maximum of 80 guest rooms in lieu of the otherwise permitted 36 guest rooms pursuant to LAMC Section 12.10-C,4.
2. A maximum Floor Area Ratio (FAR) of 5.06:1 in lieu of the otherwise permitted 3:1 FAR pursuant to LAMC Section 12.21.1.
3. A maximum building height of 58 feet in lieu of the otherwise maximum 45 feet pursuant to LAMC Section 12.21.1.
4. A continuous width of the exterior walls fronting Holt Avenue to exceed 40 feet without a change in plane as otherwise required pursuant to Ordinance No. 167,335.
5. A 10-foot front yard in lieu of the otherwise required 20-foot front yard pursuant to Ordinance No. 167,335.
6. 6-foot side yards in lieu of the otherwise required 8-foot side yards pursuant to Ordinance No. 167,335.
7. Waiver of the long-term bicycle parking requirements otherwise required pursuant to LAMC Section 12.21-A,16(a)(2).

Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, haul route permits, excavation permits, foundation permits, building permits, and sign permits.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:11 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 4 of 20.

Section 2

Environmental Analysis

1 Regulatory Framework

Title 14 of the California Code of Regulations, Chapter 3 (Guidelines for Implementation of the California Environmental Quality Act (CEQA), Article 19 (Categorical Exemptions), Section 15300 (Categorical Exemptions) includes a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA.

For the reasons set forth below, the Project meets all appropriate criteria to be categorically exempt from CEQA under the Class 32 “urban infill” exemption, as set forth in Section 15332, Article 19, Chapter 3, Title 14 of the California Code of Regulations (CCR). The Class 32 exemption promotes infill development within urbanized areas by exempting environmentally benign urban in-fill projects that are consistent with the local general plan and zoning requirements and can be served with existing utilities and public services. The Class 32 exemption also does not apply to projects that would result in significant traffic, noise, air quality, or water quality impacts. Application of this exemption, as with all categorical exemptions, is limited by the regulatory exceptions identified in Section 15300.2, listed below.

Section 15332. In-Fill Development Projects.

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

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

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

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

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

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

Section 15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply [to] all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated,

precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

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

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

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

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

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

2 Discussion of CCR Section 15332(a)

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

In order to qualify for a Class 32 exemption, a project must be found to be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. It is worth noting that plan inconsistencies in and of themselves are not a significant impact on the environment cognizable under CEQA, which recognizes only direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment.¹

The legal standard that governs consistency determinations general plans is that a project must only be in general “harmony” with the plan, it doesn’t require perfect conformity with each and every provision and requirement of a plan, subject to the significant discretion of the permitting land use authority.²

2.1 General Plan

The General Plan consists of seven State-mandated elements: Land Use, Mobility, Noise, Safety, Housing, Open Space, and Conservation; and elements addressing Air Quality, Infrastructure Systems, Public Facilities and Services, Health and Wellness, as well as the Citywide General Plan Framework Element. The Framework Element establishes the overall policy and direction for the City’s entire General Plan. It provides a citywide context and a comprehensive long-range strategy to guide the comprehensive update of the General Plan’s other mandated and optional elements. The Framework Element establishes the fundamental and over-arching goals, objectives and policies for the City and its Community Plans and Specific Plans.

2.1.1 Land Use

In Los Angeles, the Land Use element of the General Plan is made up of the City’s 35 Community Plans. The Project would demonstrate consistency with the Land Use Element through consistency with the Community Plan (discussed below).

¹ See Guidelines Section 15064(d)-(e),

² See *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 717-18 [upholding a city’s determination that a subdivision project was consistent with the applicable general plan]. As the Court explained in *Sequoyah*, “state law does not require an exact match between a proposed subdivision and the applicable general plan.” To be “consistent” with the general plan, a project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning, the project must be “in agreement or harmony with the applicable plan.” (see also *Greenebaum v. City of Los Angeles* (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan v. City And County Of San Francisco*, 102 Cal.App.4th at p. 678.) Further, “[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.” (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans “ordinarily do not state specific mandates or prohibitions,” but instead provide “policies and set forth goals.” (*Friends of Lagoon Valley*.)

2.1.2 Mobility Element

The goals of the Transportation Chapter of the Framework Element are to provide adequate accessibility to commerce, work opportunities, and essential services, and to maintain acceptable levels of mobility for all those who live, work, travel, or move goods in the City. The Transportation Chapter includes proposals for major transportation improvements to enhance the movement of goods and to provide greater access to major intermodal facilities, such as the ports and airports. As discussed in the Transportation Chapter of the Framework Element, the goals, objectives, policies, and related implementation programs of the Transportation Chapter are set forth in the Transportation Element of the General Plan adopted by the City in September 1999. As an update to the Transportation Element, the City Council initially adopted Mobility Plan 2035 in August 2015. The Mobility Plan 2035 was readopted in January 2016 and amended in September 2016.³ Mobility Plan 2035 incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. Mobility Plan 2035 includes five main goals that define the City’s high-level mobility priorities: (1) Safety First; (2) World Class Infrastructure; (3) Access for All Angelenos; (4) Collaboration, Communication, and Informed Choices; and (5) Clean Environments and Healthy Communities. Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through Mobility Plan 2035.

2.1.3 Noise Element

The Noise Element includes programs and noise mitigation guidelines, but also recognizes that many noise sources are beyond the City’s jurisdictional control. The Noise Element is implemented by the City’s noise ordinances, against which the Project’s noise impacts are analyzed herein.

2.1.4 Safety Element

The Safety Element of the General Plan provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster and initial recovery from a natural disaster. Chapters I and III of the Safety Element outline the scope of the City Emergency Operations Organization (EOO)’s on-going efforts to use experiences and new information to improve the City’s hazard program. Chapter II outlines the City’s historic commitment to improving its prevention of controllable disasters, mitigation of impacts associated with disasters and response to disaster events. Goals and policies of the Safety Element, relate to hazard mitigation by the City, including emergency response (multi-hazard), and disaster recovery (multi-hazard). The goals and objectives of the Safety Element provide a guideline for the City’s service systems and do not relate to actions of the private developer. As such, these goals and objectives are not evaluated. However, regulations arising out of the objectives of the Safety Element are reflected in the Building and Safety Code and the Fire Code provision with which the Project must comply in order to obtain building permits and a certificate of occupancy.

³ City of Los Angeles, Department of City Planning, Mobility Plan 2035, adopted September 2016.

2.1.5 Housing Element

Adopted in December 2013, the Housing Element 2013–2021 of the City’s General Plan identifies four primary goals and associated objectives, policies, and programs. The goals are as follows:

- A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy, sanitary, and affordable to people of all income levels, races, ages, and suitable for their various needs;
- A City in which housing helps to create safe, livable and sustainable neighborhoods;
- A City where there are housing opportunities for all without discrimination; and
- A City committed to ending and preventing homelessness.

An update to the Housing Element for 2021-2029 is expected to be adopted in fall 2021.⁴

2.1.6 Open Space Element

The Open Space and Conservation Chapter of the Framework Element contains goals, objectives, and policies to guide the provision, management, and conservation of public open space resources; address the outdoor recreational needs of the City’s residents; and guide amendments to the General Plan Open Space Element and Conservation Element.

2.1.7 Conservation Element

The City of Los Angeles General Plan includes a Conservation Element. Section 5 of the Conservation Element recognizes the City’s responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities.⁵

2.1.8 Consistency Analysis

Table 2-1, General Plan, lists the goals for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) goals of the General Plan for each land use. The Project’s uses are consistent with the goals of the General Plan Framework. Therefore, there would be no significant impacts due to consistency with land use designations in the General Plan.

⁴ City of Los Angeles, Housing Element Update: <https://planning.lacity.org/plans-policies/housing-element-update>

⁵ City of Los Angeles Conservation Element of the General Plan, adopted September 26, 2001, p. II-9.

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
Framework Element Land Use Chapter	
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	Consistent. The Project would result in the development 80 new eldercare guest rooms. This Project thus contributes towards and facilitates the City's long-term economic viability and vision for a more livable city by constructing much-needed new housing for a segment of the population in recognized need of new housing and services.
Mobility Element	
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.	Consistent. The Project would promote this policy by providing adequate vehicular access, providing short-term bicycle parking and other support facilities for employees and visitors, including employee showers. Due to the Project's proposed service population, residents are unlikely to ride bicycles, therefore, the Project would not provide, nor require long-term bicycle parking.
Policy 3.2: Accommodate the needs of people with disabilities when modifying or installing infrastructure in the public right-of-way.	Consistent. The Project would be designed to provide accessibility and accommodate the needs of people with disabilities as required by the American with Disabilities Act (ADA) the City's applicable related building code regulations, and state licensing standards for Eldercare Facilities.
Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.	Consistent. The Project would promote equitable land use decisions that result in fewer vehicle trips by providing a new eldercare facility that would include new employment opportunities in close proximity to public transit options, jobs (including construction jobs).
Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.	Consistent. The Project would be located in an area well-served by public transit provided by Metro.
Policy 3.7: Improve transit access and service to major regional destinations, job centers, and inter-modal facilities.	Consistent. The Project would be located in an area well-served by public transit provided by Metro.
Policy 3.9: Discourage the vacation of public rights-of-way	Consistent. The Project would not vacate any public rights-of-way, all associated public rights-of-way would be maintained as part of the Project.
Policy 3.10: Discourage the use of cul-de-sacs that do not provide access for active transportation options.	Consistent. The Project would not include the development of a cul-de-sac.
Policy 4.8 Encourage greater utilization of Transportation Demand Management (TDM) strategies to reduce dependence on single-occupancy vehicles.	Consistent. Because the Project does not include over 50,000 square feet of retail use, does not generate greater than 250 net-new daily vehicle trips, and does not replace an existing number of residential units with fewer units, Project does not meet LADOT's transportation assessment guidelines requirements to

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
	conduct a vehicle miles traveled analysis. Therefore, the Project's transportation impacts are less than significant and no transportation demand management strategies are required.
Policy 4.13 Balance on-street and off-street parking supply with other transportation and land use objectives.	<p>Consistent. The City's Mobility Plan 2035 recognizes that an oversupply of parking can undermine broader regional goals of creating vibrant public spaces and a robust multimodal mobility system and that parking consumes a vast amount of space in the urban environment, which otherwise could be put to valuable alternative uses. Additionally, the Mobility Plan observes that large parking lots create significant environmental impacts, detract from neighborhoods' visual quality, and discourage walking by increasing the distances between services and facilities.</p> <p>Adequate parking would be provided on-site in accordance with LAMC requirements applicable to Eldercare Facilities, which include reduced parking ratios in light of the unique needs of the service population. Furthermore, the Project would be located in an area well-served by public transit, which would reduce parking demand.</p>
Policy 5.5 Maximize opportunities to capture and infiltrate stormwater within the City's public right-of-ways.	<p>Consistent. During construction, the Project would incorporate best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff in accordance with the City's applicable code storm water-related construction standards. In addition, during operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the City's Low Impact Development (LID) ordinance.</p>
Housing Element	
Objective 1.1 Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.	<p>Consistent. The Project would develop 80 eldercare guest rooms. The Project would contribute to the total number of dwelling units in support of the goals of the Regional Housing Needs Assessment.</p>
<p>Program 9. Facilitate Housing for Senior and Disabled Persons</p> <p>Give senior and disabled housing projects preferential access to Development Services Case Management (development review service). Assist developers in developing housing for seniors and for disabled persons through streamlined land use entitlement</p>	<p>Consistent. The Project would develop 80 eldercare guest rooms.</p>

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
<p>procedures for a variety of housing types, including: Independent Senior Housing, Assisted Living Care Housing, Skilled Nursing Care Housing and Alzheimer's/Dementia Care Housing, pursuant to the Eldercare Facilities Ordinance. Explore options to introduce greater accessibility and affordability into the Eldercare process, given the significant zoning benefits provided. Provide expedited permitting services for senior developments through the Development Services Case Management (DSCM) program as well as the Parallel Design Permitting Program (PDPP). Also see the support of accessible design in housing unit design (Program 11), the development of supportive housing options that serve persons with special needs (5, 6, 119, and 121) and the removal of zoning barriers to health and health facilities (133).</p> <p>Objective: Construction 1,750 Eldercare units.</p>	
Conservation Element	
<p>15.1 Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.</p>	<p>Consistent. The Project Site and surrounding area are characterized by dense urban development. Due to existing buildings in the area, views are generally obstructed, and no scenic vistas exist. Therefore, the Project would not have any adverse effect on a scenic vista for the enjoyment of present and future generations. Moreover, the Project's aesthetic impacts are deemed to be less than significant as a matter of law pursuant to state law SB 743.</p>
<p>15.1 Policy: Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.</p>	<p>Consistent. The Project Site does not contain any significant existing land forms (e.g., ridge lines, bluffs, unique geologic features) or unique scenic features (historic, ocean, mountains, unique natural features). The Project Site is located in an urbanized portion of the City and, topographically, is relatively flat with no natural features. The Project Site is not a part of a scenic resource and would not obstruct any scenic views.</p>
Health and Wellness Element	
<p>1.5 Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.</p>	<p>Consistent. The Project would provide housing opportunities to the community that require substantial support services and common areas to provide a healthy environment for a senior population to age in place. The Project seeks to provide significant "quality-of-life" amenities rather than minimally-equipped</p>

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
	<p>facilities. The proposed common areas include a dining area, bistro, large kitchen, a second common kitchen and dining area is provided on the second level to serve the Alzheimer's component. In addition, there are laundry facilities, common bathrooms and other on-site amenities such as libraries, fitness room, activities room, beauty salon and lounge areas on each level. All of the resident rooms are designed as Guest Rooms without a kitchen and will be smaller in size than a standard Dwelling Unit. Much of the increased floor area is devoted to common areas serving the needs of the residents, which are contained largely in the first subterranean level of the building. The building design maximizes natural light and natural ventilation for the primary common areas below grade by means of two extensive courtyards that daylight out to the sky.</p>
<p>3.8 Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across ages and level of abilities.</p>	<p>Consistent. The Project includes indoor and out amenity spaces to provide for healthy activities.</p>
<p>5.3 Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.</p>	<p>Consistent. The Project would reduce exposure to second-hand smoke in accordance with applicable law, such as prohibition on smoking in rental residential units (California Civil Code Section 1947.5).</p>
<p>5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.</p>	<p>Consistent. The Project's regional and local, construction emissions and operational emissions would be less than significant (see the air quality analysis below). The Project would comply with existing regulations pertaining to hazardous materials to ensure that no significant impacts related to upset and accident conditions related to hazardous materials would occur as a result of the Project.</p> <p>Finally, the Project does not include facilities that would utilize hazardous materials in any significant amounts, such as a dry cleaner, industrial manufacturing processes, or automotive repair facilities. The Project would not result in any impacts related to odors.</p>
<p>5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.</p>	<p>Consistent. The Project would comply with Section 2485 in CCR Title 13, which requires trucks and vehicles in loading and unloading queues to have their engines turned off after five minutes when not in use, in order to reduce vehicle emissions.</p>
<p>Infrastructure and Public Services Chapter</p>	
<p>Policy 9.3.1: Reduce the amount of hazardous</p>	<p>Consistent. The Project would support this City policy</p>

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
substances and the total amount of flow entering the wastewater system.	through compliance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), which requires the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. The Project would also be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Thus, Best Management Practices (BMPs) would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The treatment method proposed for the Project Site is the implementation of High Efficiency Biofiltration Systems (flow-through planters) to manage stormwater runoff in accordance with current LID requirements. Thus, the Project would reduce the amount of hazardous substances and total amount of flow entering the wastewater system.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	Consistent. See Policy 9.3.1. above under Infrastructure and Public Services Chapter.
Objective 9.10: Ensure that water supply, storage, and delivery systems are adequate to support planned development.	Consistent. Based on LADWP's demand projections provided in its 2020 Urban Water Management Plan (UWMP) ⁶ , 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. As the Project's water demand is accounted for in the City's future projected demands (the 2020-2045 RTP includes growth throughout the Los Angeles subregion and informs the LADWP 2020 UWMP), the Project would not require the construction or expansion of new water treatment facilities that could cause a significant environmental effect. In general, projects that conform to SCAG's 2020-2045 RTP demographic projections and are in the City's service area are considered to have been included in LADWP's water supply planning efforts in the UWMP. In terms of the City's overall water supply condition, the water requirement for any project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. Furthermore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site.

⁶ LADWP 2020 Urban Water Management Plan, page ES-6: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln.jsessionid=0LnWhxdVj2JJg2Vm6Xrr4rmqyLL9GtlpLdJBQxVQgdb53TnwhJRB!-1106340359?_afLoop=151440072116797&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLooop%3D151440072116797%26_afWindowMode%3D0%26_adf.ctrl-state%3Dw319yjmek_4

Table 2-1
General Plan Framework, Mobility, Housing, Conservation, Health and Wellness, and
Infrastructure and Public Services and Element Consistency Analysis

Goal, Objectives, Policies	Discussion
Goal 9P: Appropriate lighting required to: (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and information lighting such as building façade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views, driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	Consistent. The Project would introduce new sources of artificial light to the Project Site, including low-level exterior lights for security and way-finding purposes, as well as general accent lighting. The Project would not include electronic lighting or signs with flashing or strobe lights. All exterior lighting would be shielded or directed toward the areas to be lit to limit spill-over onto off-site uses. The Project would comply with the City's lighting and signage ordinances and would have signage approved by LADBS.
General Plan, Chapter 3-Land Use: https://planning.lacity.org/cwd/framwk/chapters/03/03202.htm City of Los Angeles, Conservation Element of the General Plan, March 2001. Housing Element: http://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch6.pdf City of Los Angeles, Health and Wellness Element of the General Plan, March 2015. General Plan, http://cityplanning.lacity.org/cwd/framwk/fwhome0.htm Note: This table includes only the policies that are applicable to the Project.	

2.2 Wilshire Community Plan

The Community Plan is one of 35 community plans geographically established for different areas of the City to implement the policies of the General Plan Framework Element and comprise the Land Use Element. The specific purpose of the Community Plan is to promote an arrangement of land use, circulation, and services that encourages and contributes to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City. In addition, the Community Plan serves to guide the development of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, enable economic stability and growth, responsibly manage land development and other trends, and to protect investment.

The Project Site is located within the Wilshire Community Plan (adopted on September 19, 2001)⁷.

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. As stated, the Community Plan is the Land Use Element of the City's General Plan. The Community Plan also contains policies and objectives to guide development and uses planned within the City. As addressed above, not every goal, policy, or objective is of the Community Plan applicable to the Project or the Project Site, a demonstration of consistency with the General Plan requires a finding of general harmony with the plan. The Community Plan is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within

⁷ <https://planning.lacity.org/plans-policies/community-plan-area/wilshire>

the larger framework of the City; guide the development of the Community Plan area to meet existing and anticipated needs and conditions; to balance growth and stability; regulate land development and other trends; and protect investment.

Table 2-2, Community Plan, sets forth the Community Plan objectives for residential land use and discusses the Project's consistency and applicability with each objective. The Project would not conflict with any of the objectives of the Community Plan. The Project includes urban infill uses (residential) and is located near public transit.

Additionally, the Project would promote economic development by providing construction jobs.

**Table 2-2
Community Plan**

Goals and Objectives	Discussion
Residential	
GOAL 1. Provide a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Wilshire Community.	Consistent. The proposed new Eldercare Facility, located within Tier 3 of a Transit-Oriented Community-eligible transit stop, will provide 80 guest rooms for seniors who either need assisted living services or are suffering from Alzheimer's/Dementia. The project would promote greater choice in the type of housing for that vulnerable and fast-growing group, and would provide varying levels of care to satisfy a range of needs.
Objective 1-2. Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	Consistent. The Project provides eldercare guest rooms uses near commercial centers and bus stops along La Cienega Boulevard.
Objective 1-4. Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.	Consistent. The Project provides housing for senior citizens.
https://planning.lacity.org/plans-policies/community-plan-area/wilshire	

2.3 Zoning Information

2.3.1 Transit Priority Area in the City of Los Angeles

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.⁸

The Project is considered residential housing. The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.⁹ The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.¹⁰

The Site is within a quarter-mile of the intersection of Wilshire Boulevard and La Cienega Boulevard which serves numerous bus lines (Metro 20, Metro 105, Metro 720, AVTA 786).

2.4 Zoning Code

In 2006, the City amended the Zoning Code to streamline and facilitate the development of “Eldercare Facilities” to consolidate application and land use entitlement review procedures. The Ordinance allows the development of Eldercare Facilities in any residential zone and, to meet the unique needs of such facilities, for spacing, amenities, and other needs, allows such projects to deviate from base zoning standards as long as certain hardship and neighborhood compatibility findings are made, per a Zoning Administrator determination. The definition of “Eldercare Facility” includes Alzheimer’s/Dementia Care Housing, Assisted Living Care Housing, Senior Independent Housing and Skilled Nursing Care Housing.

Eldercare Facilities are a permitted residential use within the R3 Zone. The proposed Eldercare Facility would provide Assisted Living Care and Alzheimer’s/Dementia Care services. Pursuant to the State of California’s licensing requirement, and as defined by LAMC Section 12.03, Assisted Living Care would provide assistance with two or more non-medical activities of daily living, and full-time medical services are not permitted on-site. Residents of the Alzheimer’s/Dementia Care housing may require 24-hour care, which is permitted as defined by LAMC Section 12.03.

The applicant requests an Eldercare Facility Unified Permit pursuant to LAMC Section 14.3.1 to allow the construction of a new five-story over two subterranean level Eldercare Facility over the entire site. An Eldercare Facility is defined by Section 12.03 of the LAMC as “one functionally operated facility which provides residential housing for persons 62 years and older, and which combines in one facility, two or more of the following types of uses: Senior Independent Housing, Assisted Living Care Housing, Skilled Nursing Care Housing, and/or Alzheimer’s/Dementia Care Housing. A minimum of 75 percent of the floor area, exclusive of common areas, shall consist of Senior Independent Housing and/or Assisted Living Care Housing”.

Pursuant to Section 14.3.1 of the LAMC, the Zoning Administrator is authorized to permit an Eldercare Facility to be located on a lot or lots in the A 1 through R3 Zones, or in the RAS3, R4, RAS4, R5, and all C Zones, when an Eldercare Facility does not meet the use, area, or height provisions of the respective zone contained in this chapter, or the requirements of any specific

⁸ <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>.

⁹ California Public Resources Code Section 21099(a)(4).

¹⁰ California Public Resources Code Section 21099(a)(7).

plan, supplemental use district, "T" classification, "Q" condition, "D" limitation, or Citywide regulation adopted or imposed by City action.

The Site is located within the Wilshire Community Plan area, which designates it for Medium Residential land uses, with a corresponding zone of R3; the Site is zoned [Q]R3-1-O. The property is within an Oil Drilling District, but not within the boundaries of or subject to any specific plan, community design overlay, or interim control ordinance. The Site is subject to "Q" Qualified Conditions pursuant to Ordinance 167,335, which regulates open space, parking, building articulation, setbacks and tree planting requirements.

As reflected by substantial evidence in the City's record for the Project including the City's proposed findings for the approval of the Project, the requested deviations from the LAMC are necessary to support the unique needs of the service population and to ensure a financially viable eldercare facility; without such deviations it is impractical and infeasible to build such a facility on the Site. With regard to hardship, substantial evidence in the record is provided for the Project and consists of expert financial consultant reports from the Concord Group, dated August 14, 2020 and April 19, 2021, respective. As a result of the facts and evidence in the record and all findings in support of the Project's proposed deviations from base code standards as allowed by the City's Eldercare Ordinance, the Project is consistent with the zoning code.

2.5 Conclusion

For all the foregoing reasons, the Project would be consistent with the applicable goals and policies of the City's land use plans and zoning for the Project Site.

Therefore, the Project would comply with CCR Section 15332(a).

3 Discussion of CCR Section 15332(b)

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

As defined by CEQA Section 21071:

“Urbanized area” means either of the following: (a) An incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons. (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

The Project Site is located in an urbanized area of the City of Los Angeles. Urban land uses directly abut and surround the Project Site on all sides.

Surrounding properties are zoned [Q]R3-1-O and improved with multi-level, multi-family apartment buildings.

The Project Site measures 0.41 acres, which is less than five acres. The Project Site is located within the City of Los Angeles with a population well over 100,000 persons. Therefore, the development occurs within the City limits, is of no more than five acres, and is substantially surrounded by urban uses.

Therefore, the Project would comply with CCR Section 15332(b).

4 Discussion of CCR Section 15332(c)

The project site has no value as habitat for endangered, rare or threatened species.

This section is based on the following item, included as **Appendix B** of this CE:

B Tree Report, Tree and Design, March 11, 2021.

4.1 Trees

The City has a list of protected trees¹¹ and shrubs.¹² Three street trees are California Sycamores, which is a protected tree species. To properly grade, prepare the Site, and build the Project, existing onsite trees would be removed and new trees would be planted.

The onsite trees and surrounding right-of-way sidewalk street trees are summarized in **Table 1-2, Trees** of this report and reflect the tree survey attached hereto as Appendix B. In accordance with the tree survey, there are 13 trees onsite and adjacent to the Site in the public right-of-way (8 onsite and 5 street). The 8 existing onsite trees would be removed to facilitate construction of the new building. One street tree would be removed to allow for the proposed driveway on the northeast corner of the Site. The four remaining street trees would remain in place. The City's Protected Tree Ordinance (Ord. No. 177,404) includes a list of protected trees¹³ and shrubs and provides permitting and replacement requirements for such trees.¹⁴ The Project Site contains three street trees identified as California Sycamores, which are listed in under the Tree Ordinance as protected. The one street tree proposed for removal by the Project is a California Sycamores, which is a protected tree.

Any tree removal must comply with the City's Tree Replacement Program administered by Urban Forestry Division, Bureau of Street Services. Removal or relocation of protected trees and shrubs would require a permit from the Board of Public Works and would be required to comply with the City's Protected Tree Ordinance. The current minimum requirements for protected tree replacement are 2:1, and can be up to 4:1 pursuant to the order of the Board of Public Works.¹⁵ The species of the replacement trees and shrubs, as well as the location of each, will be formally documented in the process of obtaining a removal permit, which would include appropriate conditions that would both govern removal and replacement of protected trees, and also include conditions for the protection of the trees. Compliance with the requirements of the Protected Tree Ordinance would ensure the Project would not result in any

¹¹ LAMC Section 46.01: "PROTECTED TREE" means any of the following Southern California native tree species which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus dumosa*). (b) Southern California Black Walnut (*Juglans californica* var. *californica*) (c) Western (California) Sycamore (*Platanus racemosa*) (d) California Bay (*Umbellularia californica*) This definition shall not include any tree grown or held for sale by a licensed nursery, or trees planted or grown as a part of a tree planting program.

¹² Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

¹³ See Footnote 11, above.

¹⁴ Effective February 4, 2021 in Ordinance No 186,873, the City added Mexican elderberry and toyon shrubs to the list of protected species.

significant environmental impacts with respect to protected tree removals. Non-protected onsite trees would be replaced at a 1:1 ratio. For the 8 non-protected onsite trees that would be removed, the Project proposes tree replacement at a greater than 1:1 ratio, with a proposed planting of 94 new trees.

The California Natural Diversity Database (CNDDDB) identifies the following special-status habitats as occurring within the Beverly Hills quadrangle: California Walnut Woodland and Southern Coast Live oak Riparian Forest.¹⁶ No special status habitats are present on the Project Site and there is no potential to occur.

According to the California Department of Fish and Wildlife (CDFW), California Sycamore is not listed in the Endangered, Threatened, and Rare Plants List.¹⁷

For the above described reasoning, California Sycamore is not considered an endangered, rare, or threatened species. Thus, the proposed removal of one California Sycamore would not result in any impacts to endangered, rare or threatened species, and relevant impacts would not be significant as a result of mandatory compliance with the City's protected tree ordinance, which requires replacement of removed protected trees.

4.2 Habitat for Species

The Project Site is completely surrounded by urban uses and developed with buildings.

No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site.¹⁸ The nearest wetland habitat is Benedict Channel adjacent to the Hillcrest Country Club, which classified as riverine and located approximately 1.5 miles southwest of the Project Site.¹⁹

No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.²⁰ Due to the highly urbanized nature of the Project Site and surrounding area, the lack of a major water body, and the lack of trees (only palms), the Project Site is not a habitat for native resident or migratory species or contain native nurseries.

There are no City or County significant ecological areas on or around the Project Site.²¹ There are no California Natural Community Conservation Plans (CNCCP) in the area. The only

¹⁶ CDFW, Biographic Information and Observation System: <https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick>

¹⁷ CDFW, Endangered, Threatened, and Rare Plants List, October 2021: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>

¹⁸ U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed October 21, 2021.

¹⁹ U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed September 15, 2021.

²⁰ U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed October 21, 2021.

²¹ Navigate LA, Significant Ecological Areas layer: <http://navigate.la.lacity.org/navigate/>, accessed October 21, 2021.

CNCCP in LA County is in the City of Rancho Palos Verdes.²² There are no Habitat Conservation Plans near the Site.²³

Thus, there exists no value for the Project Site as habitat for endangered, rare, or threatened species. Further, the Project Site is not located in an approved local, regional, or state habitat conservation plan.

4.3 Other Considerations

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 CFR Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The City's Bureau of Street Services, Urban Forestry Division complies with the MBTA for tree pruning and tree removal. The Project would comply with the regulations of the CDFW²⁴ and USFWS.²⁵

4.4 Conclusion

Based on the foregoing, the Project would not conflict with any local policies or ordinances protecting biological resources, or with the provisions of an adopted Habitat Conservation Plan. Accordingly, the Site has no value as habitat for endangered, rare, or threatened species.

Therefore, the Project would comply with CCR Section 15332(c).

²² California Natural Community Conservation Plans, April 2019, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed October 21, 2021.

²³ USFWS, Habitat Conservation Plans: <https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP>, accessed October 21, 2021.

²⁴ <http://www.leginfo.ca.gov/.html/fgctableofcontents.html>

²⁵ <https://www.fws.gov/birds/policies-and-regulations/laws-legislations/migratory-bird-treaty-act.php>, accessed October 21, 2021.

5 Discussion of CCR Section 15332(d): Traffic

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.²⁶

This section is based on the following item, included as **Appendix C** of this CE:

C Transportation Study Assessment Referral Form, Los Angeles Department of Transportation, August 5, 2020.

5.1 Construction

A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan would be prepared and submitted to the City for review and approval prior to commencing construction and is part of the building permit approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

Construction activities would be primarily contained within the Project Site boundaries. However, construction fencing may encroach into the public ROW (e.g., sidewalks and roadways) adjacent to the Project Site. The existing parking lane on Holt Avenue adjacent to the Site could be temporarily closed throughout the construction period. Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan and emergency access would not be impeded. Permits for any right of way closures would be reviewed and approved by LADOT and LADBS based on detailed plans to be developed during the permitting phase of Project development.

Any temporary use of the public ROW may require temporary re-routing of pedestrian and bicycle traffic. The future Construction Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use, as appropriate, of light-duty barriers and cones, use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

There are no existing bus stops located adjacent to the Project Site and, thus, no temporary relocation of any bus stop is anticipated due to the construction of the Project.

The curb lanes along Holt Avenue are anticipated to be used for staging, deliveries, and/or equipment placement during construction. Thus, construction activities would potentially result in temporary loss of up to 5 parking spaces.

Construction workers would be encouraged to use public transit services to the Project Site, if needed. Construction workers generally arrive at and depart from the worksite outside of peak

²⁶ Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section below.

traffic hours. Project construction would result in varying levels of truck and worker traffic to and from the Project Site on a daily basis.

The haul trips would occur during the permissible hauling hours identified by the Department of Building and Safety. Thus, construction traffic trips would not be anticipated to contribute to a significant increase in the overall congestion in the Project Site vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction.

It should be noted that because a formal haul route approval is not required for the Project, it is assumed that La Cienega Avenue would be a logical access point for a haul route that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways like the Santa Monica Freeway to the south.

Truck traffic would not create a potentially significant traffic impact due to the number of truck trips per day and the temporary nature of construction activities. Therefore, no significant Project impacts related to construction traffic would occur.

5.2 Operation

Under the Los Angeles Department of City Planning's current procedure, after filing a Planning case for a proposed project, the "Transportation Study Assessment, Department of Transportation – Referral Form" must be completed and reviewed by Planning staff. The form is intended to screen whether a proposed project is required to conduct a full transportation assessment in accordance with Los Angeles Department of Transportation (LADOT) guidelines.

LADOT's Transportation Assessment Guidelines (July 2020) (TAG) provides screening criteria to determine whether traffic analysis is required under the California Environmental Quality Act (CEQA). CEQA analysis is based on vehicle miles traveled (VMT) that could be generated by the Project.

The TAG on page 1-2 states that a development project requires preparation of a transportation assessment if it is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action by the City. The Project would require a discretionary action. The Project trip generation was estimated to determine whether the other half of the criteria is satisfied.

The TAG allows the use of LADOT's VMT Calculator tool (version 1.3, released July 2020) to estimate daily trips for the purpose of screening a development project. The VMT Calculator is programmed with trip generation rates from Trip Generation Manual, 9th Edition (Institute of Transportation Engineers [ITE], 2012). It also applies various adjustment factors based on the Project's proximity to transit, surrounding density of development, etc. It considers trips generated by the Project uses and discounts trips generated by existing or recently operating uses that would be removed from the Project site.

According to the staff report proposing the Eldercare Facility Unified Permit process, prepared by the Department of City Planning and dated May 8, 2003, staff and visitor parking needs are reflected in the parking requirements. Further, "[r]esident vehicles do not contribute measurably

to traffic volumes generated by Eldercare Facilities, because most residents, as a result of their age and physical limitations, do not drive.

Table 5-1 summarizes daily trip generation for the Project. As shown, the Project would generate a net increase of 87 daily trips. Therefore, the project would not result in a significant transportation impact on Vehicle Miles Traveled (VMT). Based on the VMT thresholds established in LADOT's TAG, the Project does not exceed the 250 daily trip threshold for a significant impact.

Table 5-1
Trip Generation Estimates

Land Use	Size	Daily Trip
Senior Units (Eldercare)	80 units	127
Duplex (removed)	3 units	(40)
Net Total		87
Transportation Study Assessment Referral Form, LADOT, August 5, 2020.		

5.3 Conclusion

For all the foregoing reasons, the Project would not have a significant traffic impact and satisfies the traffic requirement in CCR Section 15332(d) related to traffic.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:18 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 5 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

6 Discussion of CCR Section 15332(d): Noise

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.²⁷

This section is based on the following item, included as **Appendix D** of this CE:

D Noise Technical Modeling, DKA Planning.

6.1 Fundamentals of Noise

6.1.1 Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (i.e., dB). Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range. On this scale, the range of human hearing extends from 3 to 140 dBA. **Table 6-1** provides examples of A-weighted noise levels from common sources.

Table 6-1
A-Weighted Decibel Scale

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

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

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

²⁷ Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section.

Maximum Noise Level (L_{\max}): L_{\max} represents the maximum instantaneous noise level measured during a given time period.

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

Effects of Noise. The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds above 85 dB can cause hearing loss. Sounds less than 75 dBA, even after continuous exposure, are unlikely to cause hearing loss.²⁸ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.²⁹

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

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA while changes of 5 dBA can be readily noticeable. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response.³¹ However, few people are highly annoyed by noise levels below 55 dBA L_{eq} .³²

²⁸ National Institute of Health, National Institute on Deafness and Other Communication, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

²⁹ World Health Organization, Guidelines for Community Noise, 1999.

³⁰ Ibid.

³¹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2018.

³² World Health Organization, Guidelines for Community Noise, 1999.

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

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.³³ The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

6.2 Regulatory Framework

6.2.1 Federal

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

6.2.2 State

6.2.2.1 2017 General Plan Guidelines

The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. **Table 6-2** illustrates State compatibility considerations between various land uses and exterior noise levels.

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

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards

³³ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

(Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms. The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

Table 6-2
State of California Noise/Land Use Compatibility Matrix

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
					CU			
Residential – Multi-Family	NA							
		CA						
					NU			
					CU			
Transient Lodging – Motels, Hotels	NA							
		CA						
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
		CA						
					NU			
							CU	
		CA						
Sports Arenas, Outdoor Spectator Sports					CU			
	CA							
					CU			
Playgrounds, Neighborhood Parks	NA							
					NU			
							CU	
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
					NU			
							CU	
Office Buildings, Business Commercial and Professional	NA							
					CA			
							NU	
Industrial, Manufacturing, Utilities, Agriculture	NA							
					CA			
							NU	

NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: CA Office of Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix D), Figure 2, 2017.

6.2.3 City of Los Angeles

6.2.3.1 General Plan Noise Element

The City of Los Angeles General Plan includes a Noise Element that includes policies and standards in order to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. There are also references to programs applicable to construction projects that call for protection of noise sensitive uses and use of best practices to minimize short-term noise impacts. However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown in **Table 6-2** above, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

6.2.3.2 Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary construction activities.

Section 41.40(a) would prohibit specific Project construction activities from occurring between the hours of 9:00 PM and 7:00 AM, Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 AM or after 6:00 PM on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 AM to 9:00 PM, and 8:00 AM to 6:00 PM on Saturdays or national holidays.

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

In addition, the LAMC regulates long-term operations of land uses, including but not limited to the following regulations.

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

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

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

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

6.3 Existing Conditions

6.3.1 Noise-Sensitive Receptors

Land uses sensitive to noise may include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Local receptors mainly include residences and some institutional land uses such as schools and churches.

The Project Site is located in the Wilshire community plan area of Los Angeles, a mixed neighborhood with multi-family residences and commercial and retail uses. As a result, the sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following representative sampling:

- Multi-family residences, 819-821 Holt Avenue, five feet north of the Project Site.
- Multi-family residences, 824-838 Sherbourne Drive, 40 feet west of the Project Site.
- Multi-family residences, 824 Holt Avenue, 80 feet east of the Project Site.
- Beverly Hills Tennis, 325 La Cienega Boulevard, 590 feet southeast of the Project Site.
- Margaret Herrick Library, 333 La Cienega Boulevard, 600 feet southeast of the Project Site.
- La Cienega Park, 8400 Gregory Way, 700 feet east of the Project Site.
- 250 La Cienega Medical Building, 960 feet northeast of the Project Site.

6.3.2 Existing Ambient Noise Levels

The Project Site is occupied by six multi-family units in three buildings totaling 10,617 square feet. Noise from these uses is dominated by auto travel to and from the Project Site and use surface-level parking spaces accessed off Holt Avenue. Some minor noise is generated by mechanical equipment, such as heating and cooling equipment, as well as occasional noise from refuse and recycling trucks serving the Project Site from Holt Avenue.

DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors (**Figure 6-1**).³⁴ As shown in **Table 6-3**, noise levels along local roadways near the Project Site are consistent with those in suburban locations with modest traffic congestion. Specifically, noise levels are consistent with General Plan Noise Element guidelines for residential neighborhoods but are influenced by vehicle traffic on local streets or nearby arterials. Other noise sources are typical of residential neighborhoods (e.g., gardeners) and commercial streets (e.g., HVAC noise, construction).

Table 6-3
Existing Noise Levels

Noise Monitoring Locations	Sound Levels (dBA, L _{eq})
1. 821 South Holt Avenue	52.4
2. Margaret Herrick Library	65.9
3. La Cienega Park	71.4
4. 250 La Cienega Medical Building	68.8
5. Sherbourne Avenue	53.8
Source: DKA Planning, 2021.	

³⁴ Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

Figure 6-1
Noise Measurement Locations



6.4 Methodology

6.4.1 On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the maximum L_{max} source noise levels of the Project's potential construction equipment at a reference distance of 50 feet and comparing them to the 75 dBA at 50 feet standard set by Section 112.05 of the LAMC, as the Project is located within 500 feet of residential zones. Noise levels were then conservatively adjusted to account for standard, industry-wide best practice noise management techniques or features that would be employed during the Project's construction. The Project's potential to increase ambient noise levels at sensitive receptors by 5 dBA L_{eq} or more was also evaluated.

Construction noise levels at nearby sensitive receptors were modeled pursuant to the ISO 9613-2 (1996) sound attenuation methodology using the SoundPLAN Essential model (version 5.1). This software package considers reference equipment noise levels, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. The distance from construction equipment noise sources

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:19 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 6 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

(e.g., engines and tailpipes) assume that vehicles would not be capable of operating directly where the Project's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability, in addition to operating at reduced power and intensity to maintain precision at these locations.

6.4.2 Off-Site Construction Activities

The Project's off-site construction noise impact from haul trucks was analyzed by considering the Project's estimated haul truck usage with existing traffic and roadway noise levels along the Project's anticipated haul route. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA, the analysis focused on whether truck traffic would double traffic volumes on key roadways to be used for hauling soils to and/or from the Project Site during construction activities. Because haul trucks have a larger roadway capacity than traditional passenger vehicles, a 2.0 passenger car equivalency (PCE) was used to convert haul truck trips to an equivalent number of passenger vehicles.³⁵ It should be noted that because an official haul route has not been approved as of the preparation of this analysis, assumptions were made about logical routes that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways.

Similarly, off-site noise impacts from vendors and employees that access the construction site were also analyzed. The analysis focused on whether truck traffic would double traffic volumes on key roadways to be used for hauling soils during construction activities.

6.4.3 On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was evaluated by identifying sources of on-site noise sources and considering the impact that they could produce given the nature of the source (i.e., loudness and whether noise would be produced during daytime or more-sensitive nighttime hours), distances to nearby sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC.

Noise generated by HVAC equipment was evaluated using typical maximum HVAC equipment noise levels. These noise levels were calculated at sensitive land use locations and compared to the City's noise standards for mechanical equipment and maximum allowable noise established by the State's modeled community noise ordinance. Incremental noise increases at nearby sensitive receptors were estimated using logarithmic methodologies that consider reference equipment noise levels, noise management techniques, distance to receptors, and any attenuating features. Noise impacts from the on-site parking garage were calculated using recommended worksheets from the Federal Transit Administration.³⁶

³⁵ Transportation Research Board, Transportation Circular No. 212 and Exhibit 12-25 of Highway Capacity manual, 6th Edition.

³⁶ Federal Transit Administration, Noise Impact Assessment Spreadsheet, version 7/3/2007; 2007.

6.4.4 Off-Site Operational Project Traffic Noise Sources

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

6.5 Thresholds of Significance

6.5.1 State CEQA Guidelines

In accordance with CEQA Guidelines Section 15332(d), approval of the project would not result in any significant effects relating to noise.

6.5.2 Construction Noise Threshold

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

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

6.5.3 Operational Noise Thresholds

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

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines.
- Project operations would cause any 5 dBA or greater noise increase.³⁷

³⁷ As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a

6.6 Analysis of Project Impacts

6.6.1 Construction

6.6.1.1 On-Site Construction Activities

Proposed construction would generate noise during the phases of construction that would span 18 months of grading, building construction, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 AM and 6:00 PM. The Project would require heavy equipment (e.g., excavators, loaders, other earthmoving vehicles) during the grading and excavation of soils. Later in the construction of the building, smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized (**Table 6-4**). Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Table 6-4
Maximum Construction Noise Levels

Noise Source	Noise Level (dBA, L_{max}) ¹
	Reference
Backhoe	80
Compactor	82
Crane	83
Dozer	85
Grader	85
Front End Loader	80
Paver	85
Roller	85
¹ Federal Transit Administration Noise and Vibration Manual, 2018.	

While **Table 6-4** summarizes maximum noise levels for each piece of equipment, actual noise levels would generally be lower for three key reasons. First, equipment does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during the when no noise is generated by that equipment. Third, during the grading phase, as construction activities descend below grade, adjacent land uses sensitive to noise are increasingly shielded from noise from construction equipment.

Regardless of the construction activity, compliance with LAMC Section 112.05 would limit noise levels from powered construction equipment to 75 dBA or below at 50 feet, as the Project Site is within 500 feet of residential zones. This is generally met by using newer, quieter equipment with more effective mufflers to dampen noise from internal combustion engines and warming-up or staging equipment away from sensitive receptors (consistent with General Plan Noise Element Program P11). Therefore, compliance with LAMC Section 112.05 would minimize

readily noticeable 5 dBA increase is still to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be less than significant.

potential noise impacts from construction equipment. Based on construction equipment to be used at the Project Site, noise from construction activities would attenuate quickly (**Figure 6-2**).

When considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously could nevertheless increase noise by up to 4.1 dBA L_{eq} at the closest sensitive receptor (**Table 6-5**). This increase would not exceed the City's 5 dBA threshold and would be considered a less than significant impact.

Figure 6-2
Construction Noise Impacts



Table 6-5
Construction Noise Impacts at Off-Site Sensitive Receptors

Building	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase	Significant ?
1. 821 South Holt Avenue	54.3	52.4	56.5	4.1	No
2. Margaret Herrick Library	37.0	65.9	65.9	0.0	No
3. La Cienega Park	36.8	71.4	71.4	0.0	No
4. 250 La Cienega Medical	30.8	68.8	68.8	0.0	No
5. Sherbourne Avenue	54.0	53.8	56.9	3.1	No
Source: DKA Planning 2021					

6.6.1.2 Off-Site Construction Activities

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require about 1,422 haul trips to export soils to off-site landfills. While a haul route has not been approved, haul trucks would likely use La Cienega Boulevard southbound to access the west- or eastbound lanes of the Santa Monica Freeway (I-10).

A 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. The grading phase would average approximately nine haul trucks per hour over an eight-hour day that would travel along La Cienega Boulevard and then accessing freeways to reach landfill locations. A doubling of traffic volumes is required to increase ambient noise levels by 3 dBA. The marginal addition of about eight haul trucks per hour to local arterials would represent the equivalent of about 16 passenger vehicles, less than 0.5 percent of traffic volumes on arterials like La Cienega Boulevard that experience about 3,393 hourly trips at Olympic Boulevard in the morning peak hour and 3,563 hourly trips in the afternoon peak hour.³⁸ As a result, haul trucks would not double traffic volumes that would be needed to increase ambient noise levels by 3 dBA. As a result, the Project's off-site construction noise impact from haul trucks would be considered less than significant.

6.6.2 Operation

6.6.2.1 On-Site Operational Noise Sources

During operations, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 3 dBA CNEL, the minimum threshold of significance adopted by this analysis. As a result, the Project's on-site operational noise impacts would be considered less than significant.

Mechanical Equipment. HVAC equipment would be located on building rooftops, where equipment generates a sound pressure level of up to 95 dBA at one foot. The roof edge and a 4'5" high parapet create a natural noise barrier that reduces noise levels from rooftop HVAC units by 8 dBA or more. This is helpful in managing noise, as equipment often operates continuously throughout the day, evening, and night. Noise levels at nearby receptors from HVAC equipment placed at the edges of the roof of the Project Site would marginally increase noise at off-site receptors and generally be inaudible to all receptors. This assumes both attenuation from both the roof edge for HVAC equipment.

³⁸ City of Los Angeles, 24 Hours Traffic Volume data for La Cienega at Olympic. <http://navigatela.lacity.org/print/temp/54F70CC2-D3A3-3ED6-D8CFAB35DED40B3D.pdf?CFID=43811413&CFTOKEN=81ea35e6dc7727fd-54EF4EF3-D3A3-3ED6-DD755AEC7C047EF3>

Auto-Related Activities. The Project would include a two-level subterranean garage, of which the lower Level B1 would accommodate the Project's 36 parking spaces. Cars would enter and exit the Project Site from Holt Avenue, which faces east, approximately 90 feet from apartment buildings across Holt Avenue. Noise levels associated with the subterranean parking levels (e.g., tire squeal, slamming vehicle doors) would be contained within the parking structure, as the subterranean parking levels would be fully enclosed on all sides. As illustrated in **Table 6-6**, auto-related noise from the parking garage would increase ambient noise levels by less than one dBA, inaudible to residents of the nearest receptors to the east. As such, noise impacts from parking operations would be less than significant.

Table 6-6
Parking Garage-Related Impacts at Off-Site Sensitive Receptors

Building	Maximum Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase	Significant?
835-836 Holt Avenue	41.1	52.4	53.0	<1.0	No
Source: DKA Planning 2020 using FTA Noise Impact Assessment Spreadsheet					

Residential Uses. Noise associated with the eldercare facility would include a variety of sources, including human conversation and activities, trash collection, landscape maintenance, and commercial loading operations. These are discussed below:

Human conversation and activities. Noise associated with everyday human activities would largely be contained internally within the Project, such as an Activities/Open Lounge area on the Level B1, a subterranean level completely enclosed within the development. Noise associated with outdoor residential activities could include passive activities such as human conversation and socializing on any of the proposed outdoor spaces and uses:

- Courtyard on Level B1 outside the Activities/Open Lounge
- Dining Courtyard on Level 1, set back 15 feet from the rear property line.
- Three roof decks on Level 5, set back 15 feet or more from the rear property line

These outdoor spaces represent gathering places for outdoor activities that are both private and group oriented. These would be intermittent activities that would produce negligible impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.³⁹ Assuming an ambient noise level as low as 52.4 dBA L_{eq} along Holt Avenue, human conversations from rooftop activities could generate about 52 dB of noise at one meter (i.e., 3.2 feet).

While the noise levels from rooftop and courtyard activities would be marginal, the attenuation from the built environment would virtually eliminate any exposure to elevated noise levels at the

³⁹ Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

nearest sensitive receptors. Noise from speech and conversation generally does not exceed approximately 65 dBA at a reference distance of one meter. These noises attenuate rapidly and would not be capable of elevating surrounding ambient noise levels by more than a nominal degree. The dining courtyard would be located within the Project, shielded on three sides by the development, with the opening facing west toward the rear of multi-family residences on Sherbourne Drive. However, the courtyard would be set back 15 feet from the shared property line, helping attenuate any sound from these passive outdoor spaces. Further, garages on the adjacent properties would further shield sensitive receptors from any substantial noise exposure. As for the roof-top decks, they would also be shielded on three sides by the 5th floor residences, with the opening facing west. These decks would also be set back 15 feet or more from the shared property line to the south. In addition, a 4'5" high parapet on the roof deck would block any line-of-sight from residents and guests conversing on the rooftop to off-site receptors. As a result, the increase in ambient noise levels at nearby receptors would be negligible for sensitive receptors.

Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can generate 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.⁴⁰ However, given the limited landscape plan for the Project, such equipment is not expected to be used substantially in exterior spaces. As such, any intermittent landscape equipment would operate during the day and represent a negligible impact and ultimately be subject to compliance with LAMC Section 112.05 governing powered equipment and hand tools, LAMC Section 112.06 regulating amplified equipment in a place of public entertainment, and other nuisance regulations.

Trash collection. On-site trash and recyclable materials would be managed and picked-up on Level B2, where trash and recycling trucks would access these facilities from Holt Avenue. Solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.⁴¹ These activities would entirely within an enclosed underground garage and would not impact sensitive receptors. LAMC Section 113.01 also regulates noise from garbage collection and disposal.

Commercial loading. On-site loading and unloading activities would be managed on the Level B2, where trucks would access these facilities Holt Avenue. This area is shielded by the development in all directions and would have no direct line-of-sight to off-site receptors. As a result, there would be negligible noise impacts on off-site receptors. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10 PM and 7 AM.

Based on an assessment of these on-site sources, the impact of on-site operational noise sources would be considered less than significant.

⁴⁰ Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

⁴¹ RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003

6.6.2.2 Off-Site Operational Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily vehicle trips. On a typical weekday, the Project is forecast to generate an estimated 218 net new daily trips, including 20 net new AM peak hour trips and 23 net new PM peak hour trips.⁴²

Project-related traffic would have a negligible impact on roadside ambient noise levels in the Project vicinity. The marginal addition of up to 23 net new vehicles per hour to local arterials would represent less than 0.5 percent of traffic volumes on arterials like La Cienega Boulevard that experience about 3,393 hourly trips at Olympic Boulevard in the morning peak hour and 3,563 hourly trips in the afternoon peak hour.⁴³ This is far less than the 100 percent increase in traffic volumes needed to increase ambient noise levels by 3 dBA L_{eq} . As such, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below the Thresholds Guide criteria for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered less than significant.

6.7 Conclusion

For all the foregoing reasons, the Project would comply with CCR Section 15332(d) in that it would not have a significant impact related to noise.

⁴² DKA Planning 2020 using CalEEMod 2016.3.2 and Institute of Transportation Engineers Trip Generation Manual (10th Edition) time of day distribution for Assisted Living facilities (Land Use 254).

⁴³ City of Los Angeles, 24 Hours Traffic Volume data for La Cienega at Olympic. <http://navigatela.lacity.org/print/temp/54F70CC2-D3A3-3ED6-D8CFAB35DED40B3D.pdf?CFID=43811413&CFTOKEN=81ea35e6dc7727fd-54EF4EF3-D3A3-3ED6-DD755AEC7C047EF3>

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:20 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 7 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

7 Discussion of CCR Section 15332(d): Air Quality

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.⁴⁴

This section is based on the following item, included as **Appendix E** of this CE:

E Air Quality Technical Modeling, DKA Planning.

7.1 Regulatory Framework

7.1.1 Federal

7.1.1.1 Clean Air Act

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

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

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

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized in **Table 7-1**. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O₃, PM_{2.5}, and Pb.

⁴⁴ Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section.

Table 7-1
State and National Ambient Air Quality Standards and Attainment Status for LA County

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O ₃)	1-hour	0.09 ppm (180 µg/m ³)	Non-attainment	--	--
	8-hour	0.070 ppm (137 µg/m ³)	N/A ¹	0.070 ppm (137 µg/m ³)	Non-attainment
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	Non-attainment	150 µg/m ³	Maintenance
	Annual Arithmetic Mean	20 µg/m ³	Non-attainment	--	--
Fine Particulate Matter (PM _{2.5})	24-hour	--	--	35 µg/m ³	Non-attainment
	Annual Arithmetic Mean	12 µg/m ³	Non-attainment	12 µg/m ³	Non-attainment
Carbon Monoxide (CO)	1-hour	20 ppm (23 µg /m ³)	Attainment	35 ppm (40 µg /m ³)	Maintenance
	8-hour	9.0 ppm (10 µg /m ³)	Attainment	9 ppm (10 µg /m ³)	Maintenance
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm (338 µg/m ³)	Attainment	100 ppb (188 µg/m ³)	Maintenance
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)	Attainment	53 ppb (100 µg/m ³)	Maintenance
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm (655 µg/m ³)	Attainment	75 ppb (196 µg/m ³)	Attainment
	24-hour	0.04 ppm (105 µg/m ³)	Attainment	--	--
Lead (Pb)	30-day average	1.5 µg/m ³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m ³	Non-attainment
Visibility Reducing Particles	8-hour	Extinction of 0.07 per kilometer	N/A	No Federal Standards	
Sulfates (SO ₄)	24-hour	25 µg/m ³	Attainment	No Federal Standards	
Hydrogen Sulfide (H ₂ S)	1-hour	0.03 ppm (42 µg/m ³)	Unclassified	No Federal Standards	
Vinyl Chloride	24-hour	0.01 ppm (26 µg/m ³)	N/A	No Federal Standards	

¹N/A = not available
Source: CARB, Ambient Air Quality Standards, and attainment status, 2021
(www.arb.ca.gov/desig/adm/adm.htm).

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe

emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_x emissions have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions.

The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted.

On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

7.1.2 State

7.1.2.1 California Clean Air Act

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

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 7-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}.

7.1.2.2 Toxic Air Contaminant Identification and Control Act

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

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program.

For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel particulate matter (PM) emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing Hydrogen Sulfide (H₂S) at levels above the state standard could result in exposure to a disagreeable rotten eggs odor. The State does not regulate other odors.

7.1.2.3 California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.⁴⁵

⁴⁵ CARB, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm.

In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.⁴⁶ In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

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

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. Implementation is staggered based on fleet size, with the largest operators having begun compliance in 2014.⁴⁷

7.1.2.4 Assembly Bill 2588 Air Toxics “Hot Spots” Program

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

7.1.2.5 Air Quality and Land Use Handbook: A Community Health Perspective

CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005 to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB’s siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet

⁴⁶ CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm.

⁴⁷ CARB, In-Use Off-Road Diesel-Fueled Fleets Regulation, www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.

of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

7.1.2.6 California Code of Regulations

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

7.1.3 Regional

7.1.3.1 South Coast Air Quality Management District

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

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

- Rule 401 Visible Emissions – This rule prohibits an air discharge that results in a plume that is as dark or darker than what is designated as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.
- Rule 402 Nuisance – This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.”
- Rule 403 Fugitive Dust – This rule requires that future projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by

requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

7.1.3.2 Air Quality Management Plan

The 2016 Air Quality Management Plan (AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate strategies for reducing NO_x emissions sufficiently to meet the upcoming ozone deadline standards.

7.1.3.3 Multiple Air Toxics Exposure Study V

To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V (MATES-V), which was released in August 2021.⁴⁸ The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. The report finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the number in MATES IV. The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (MATES-V, page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (MATES-V, Figure ES-2).

7.1.3.4 Southern California Association of Governments (SCAG)

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

⁴⁸ SCAQMD MATES-V Study. <https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>

SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) on April 7, 2016.^{49,50} The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into SCAG’s prior 2012–2035 RTP/SCS. These foundational policies, which guided the development of the plan’s land use strategies, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;
- Develop “Complete Communities”;
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

On September 3, 2020, SCAG’s Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG’s determination that the SCS met the applicable state greenhouse gas emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

The RTP/SCS update addressed the continuing transportation and air quality challenges of adding 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs between 2016 and 2045. The Plan calls for \$639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent regional growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a

⁴⁹ SCAG, Final 2016–2040 RTP/SCS.

⁵⁰ CARB, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016.

15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing PM_{2.5} emissions by 4.1 percent
- Reducing GHG emissions by 19 percent by 2035

7.1.4 Local

7.1.4.1 City of Los Angeles General Plan Air Quality Element

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

Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

7.1.4.2 Clean Up Green Up Ordinance

The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. This ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

7.1.4.3 California Environmental Quality Act

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

7.1.4.4 Land Use Compatibility

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

The Project Site is more than 1,000 feet of any freeway, as it is 1.7 miles north of the mainline of the Santa Monica Freeway (I-10).

The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings located within specified distances from a freeway. This ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

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

substantial vegetation and/or a wall barrier. The Advisory Notice also informs project applicants of the regulatory requirements of the Clean Up Green Up Ordinance. Requirements for preparing HRAs were removed.

7.2 Existing Conditions

7.2.1 Pollutants and Effects

7.2.1.1 State and Federal Criteria Pollutants

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. These specific pollutants, known as “criteria air pollutants,” are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O₃), nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter ten microns or less in diameter (PM₁₀), particulate matter 2.5 microns or less in diameter (PM_{2.5}), and lead (Pb). The following descriptions of each criteria air pollutant and their health effects are based on information provided by the SCAQMD.⁵¹

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

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

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

Sulfur Dioxide (SO₂). Sulfur oxides (SO_x) are compounds of sulfur and oxygen molecules. SO₂ is the pre- dominant form found in the lower atmosphere and is a product of burning sulfur or

⁵¹ SCAQMD, Final Program Environmental Impact Report for the 2016 AQMP, <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

burning materials that contain sulfur. Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

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

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

7.2.1.2 State-only Criteria Pollutants

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

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

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

Vinyl Chloride. Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American

Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

7.2.2 Toxic Air Contaminants

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TAC can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular). CARB and OEHHA determine if a substance should be formally identified, or “listed,” as a TAC in California. A complete list of these substances is maintained on CARB’s website.⁵²

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

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.^{53,54}

⁵² CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm.

⁵³ CARB, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm.

⁵⁴ CARB, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.

7.2.4 Project Site

The Project Site is located within the South Coast Air Basin (the Basin); named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. The 6,745-square-mile Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. USEPA has classified Los Angeles County as nonattainment areas for O₃, PM_{2.5}, and lead. This classification denotes that the Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM₁₀, and PM_{2.5}. The air quality within the Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

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

7.2.4.1 Air Pollution Climatology⁵⁵

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

7.2.4.2 Air Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Northwest Coastal LA County receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. **Table 7-2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2018 through 2020. The one-hour State standard for O₃ was exceeded six times during this three-year period. The federal standard was exceeded eleven times in that same period. CO and NO₂ levels did not exceed the CAAQS from 2018 to 2020 for 1-hour (and 8-hour for CO).

⁵⁵ AQMD, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.

**Table 7-2
Ambient Air Quality Data**

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of Exceedance Standards		
	2018	2019	2020
Ozone (O₃)			
Maximum 1-hour Concentration (ppm)	0.094	0.086	0.134
Days > 0.09 ppm (State 1-hour standard)	0	0	6
Days > 0.070 ppm (Federal 8-hour standard)	2	1	8
Carbon Monoxide (CO₂)			
Maximum 1-hour Concentration (ppm)	1.6	1.9	2.0
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.3	1.2	1.2
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour Concentration (ppm)	0.0647	0.0488	0.0766
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM₁₀			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 50 µg/m ³ (State 24-hour standard)	N/A	N/A	N/A
PM_{2.5}			
Maximum 24-hour Concentration (µg/m ³)	N/A	N/A	N/A
Days > 35 µg/m ³ (Federal 24-hour standard)	N/A	N/A	N/A
Sulfur Dioxide (SO₂)			
Maximum 24-hour Concentration (ppb)	N/A	N/A	N/A
Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A
ppm = parts by volume per million of air. µg/m ³ = micrograms per cubic meter. N/A = not available at this monitoring station. Source: SCAQMD annual monitoring data at Northwest Coastal LA County subregion (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed September 11, 2021.			

7.2.4.3 Existing Health Risk in the Surrounding Area

Based on the MATES-V model, the calculated cancer risk in the Project area's zip code of 90035 is approximately 494 in a million.⁵⁶ The cancer risk in this area is predominately related to nearby sources of diesel particulate matter (e.g., diesel trucks and traffic on the Santa Monica Freeway 1.7 miles to the south). In general, the risk at the Project Site is higher than the average across the South Coast Air Basin.

The Office of Environmental Health Hazard Assessment, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen

⁵⁶ SCAQMD, MATES-V Interactive Carcinogenicity Map, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?views=view_38%2Cview_10, accessed October 22, 2021.

that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. According to CalEnviroScreen, the Project Site is located in the 95-100th percentile, which means the Project Site has an overall environmental pollution burden higher than at least 95 percent of other communities within California.⁵⁷

7.2.4.4 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The California Air Resources Board (CARB) has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Project Site is located in the Wilshire community plan area of Los Angeles, a mixed neighborhood with multi-family residences and commercial and retail uses on arterials like La Cienega Boulevard. Sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following representative sampling (see **Figure 7-1** for a depiction of some receptors):

- Multi-family residences, 819-821 Holt Avenue, five feet north of the Project Site.
- Multi-family residences, 824-838 Sherbourne Drive, 40 feet west of the Project Site.
- Multi-family residences, 824 Holt Avenue, 80 feet east of the Project Site.
- Beverly Hills Tennis, 325 La Cienega Boulevard, 590 feet southeast of the Project Site.
- Margaret Herrick Library, 333 La Cienega Boulevard, 600 feet southeast of the Project Site.
- La Cienega Park, 8400 Gregory Way, 700 feet east of the Project Site.
- 250 La Cienega Medical Building, 960 feet northeast of the Project Site.

7.2.4.5 Existing Project Site Emissions

The Project Site is occupied by six multi-family units in three buildings totaling 10,617 square feet. As shown in **Table 7-3**, the majority of emissions are from the 40 vehicle trips traveling to and from the project site on an average weekday.

⁵⁷ Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0 MAP, <https://oehha.maps.arcgis.com/apps/webappviewer/index.html?id=4560cfbce7c745c299b2d0cbb07044f5>, accessed October 22, 2021.

Table 7-3
Existing Estimated Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	<1	1	<1	1	<1
Net Regional Total	1	<1	1	<1	1	<1

Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs (included in Appendix).

Figure 7-1
Location of Sensitive Receptors



7.3 Methodology

The air quality analysis conducted for the Project is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website. The SCAQMD recommends the use of the California Emissions Estimator Model (CalEEMod, version 2016.3.2) as a tool for

quantifying emissions of air pollutants that will be generated by constructing and operating development projects. The analyses focuses on the potential change in air quality conditions due to Project implementation. Air pollutant emissions would result from both construction and operation of the Project. Specific methodologies used to evaluate these emissions are discussed below.

7.3.1 Construction

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

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

Localized impacts were analyzed in accordance with the SCAQMD Localized Significance Threshold (LST) methodology.⁵⁸ The localized effects from on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emission look-up tables and Project-specific modeling, where appropriate.⁵⁹ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. In accordance with SCAQMD guidance, maximum daily emissions of NO_x, CO, PM₁₀, and PM_{2.5} from on-site

⁵⁸ SCAQMD, Final Localized Significance Methodology, revised July 2008.

⁵⁹ SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-Up Table, October 2009.

sources during each construction activity were compared to LST values for a 1-acre site having sensitive receptors within 25 meters (82 feet).⁶⁰

The Basin is divided into 38 SRAs, each with its own set of maximum allowable LST values for on-site emissions sources during construction and operations based on locally monitored air quality. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values. The significance criteria and analysis methodologies in the SCAQMD's CEQA Air Quality Handbook were used in evaluating impacts in the context of the CEQA significance criteria listed below. The SCAQMD localized significance thresholds (LSTs) for NO₂, CO, and PM₁₀ were initially published in June 2003 and revised in July 2008.⁶¹ The LSTs for PM_{2.5} were established in October 2006.⁶² Updated LSTs were published on the SCAQMD website on October 21, 2009.⁶³ **Table 7-4** presents the significance criteria for both construction and operational emissions.

Table 7-4
SCAQMD Emissions Thresholds

Criteria Pollutant	Construction Emissions		Operation Emissions
	Regional	Localized /a/	
Volatile Organic Compounds (VOC)	75	--	55
Nitrogen Oxides (NO _x)	100	103	55
Carbon Monoxide (CO)	550	562	550
Sulfur Oxides (SO _x)	150	--	150
Respirable Particulates (PM ₁₀)	150	4	150
Fine Particulates (PM _{2.5})	55	3	55
/a/ Localized significance thresholds assumed a 1-acre and 25-meter (82-foot) receptor distance in the Northwest Coastal LA source receptor area. The SCAQMD has not developed LST values for VOC or SO _x . Pursuant to SCAQMD guidance, sensitive receptors closer than 25 meters to a construction site are to use the LSTs for receptors at 25 meters (SCAQMD Final Localized Significance Threshold Methodology, June 2008). Source: SCAQMD.			

7.3.2 Operation

CalEEMod also generates estimates of daily and annual emissions of air pollutants resulting from future operation of a project. Operational emissions of air pollutants are produced by mobile sources (vehicular travel) and stationary sources (utilities demand). The Project Site is serviced by the Los Angeles Department of Water and Power (LADWP), for which CalEEMod has derived default emissions factors for electricity and natural gas usage that are applied to the size and land use type of the Project in question. CalEEMod also generates estimated operational emissions associated water use, wastewater generation, and solid waste disposal.

Similar to construction, SCAQMD's CalEEMod software was used for the evaluation of Project emissions during operation. CalEEMod was used to calculate on-road fugitive dust, architectural coatings, landscape equipment, energy use, mobile source, and stationary source emissions.

⁶⁰ SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

⁶¹ SCAQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, 2008.

⁶² SCAQMD, Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006.

⁶³ SCAQMD, Final Localized Significance Threshold Methodology Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009.

To determine if a significant air quality impact would occur, the net increase in regional and local operational emissions generated by the Project was compared against the SCAQMD's significance thresholds.⁶⁴

7.3.3 Toxic Air Contaminants Impacts

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

7.4 Thresholds of Significance

7.4.1 State CEQA Guidelines

In accordance with CEQA Guidelines Section 15332(d), approval of the project would not result in any significant effects relating to air quality.

7.4.2 SCAQMD Thresholds

In addition, the following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G Thresholds. Under these thresholds, a significant threshold would occur when:⁶⁵

7.4.2.1 Construction

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

⁶⁴ SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015. SCAQMD based these thresholds, in part on the federal Clean Air Act and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, *CEQA Air Quality Handbook*, April 1993, pp. 6-1-6-2.).

⁶⁵ SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015.

7.4.2.2 Operation

The City bases the determination of significance of operational air quality impacts on criteria set forth in the SCAQMD's *CEQA Air Quality Handbook*.⁶⁶ However, as discussed above, the City has chosen to use Appendix G as the thresholds of significance for this analysis. Accordingly, the following serve as quantitative air quality standards to be used to evaluate project impacts under the Appendix G thresholds. Under these thresholds, a significant threshold would occur when:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC;⁶⁷ (2) 55 pounds per day for NO_x; (3) 550 pounds per day for CO; (4) 150 pounds per day for SO_x; (5) 150 pounds per day for PM₁₀; and (6) 55 pounds per day for PM_{2.5}.⁶⁸
- Maximum on-site daily localized emissions exceed the LST, resulting in predicted ambient concentrations in the vicinity of the Project Site greater than the most stringent ambient air quality standards for CO (20 parts per million (ppm) over a 1-hour period or 9.0 ppm averaged over an 8-hour period) and NO₂ (0.18 ppm over a 1-hour period, 0.1 ppm over a 3-year average of the 98th percentile of the daily maximum 1-hour average, or 0.03 ppm averaged over an annual period).⁶⁹
- Maximum on-site localized operational PM₁₀ and PM_{2.5} emissions exceed the incremental 24-hour threshold of 2.5 µg/m³ or 1.0 µg/m³ PM₁₀ averaged over an annual period.⁷⁰
- The Project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 ppm, respectively; or
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

7.4.2.3 Toxic Air Contaminants

The following criteria set forth in the SCAQMD's *CEQA Air Quality Handbook* serve as quantitative air quality standards to be used to evaluate project impacts under Appendix G thresholds. Under these thresholds, a significant threshold would occur when:⁷¹

- The Project results in the exposure of sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.⁷² For projects with a maximum incremental cancer risk

⁶⁶ SCAQMD, SCAQMD Air Quality Significance Thresholds, revised March 2015.

⁶⁷ For purposes of this analysis, emissions of VOC and reactive organic compounds (ROG) are used interchangeably since ROG represents approximately 99.9 percent of VOC emissions.

⁶⁸ SCAQMD Air Quality Significance Thresholds, www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf, last updated March 2015.

⁶⁹ SCAQMD, Final Localized Significance Threshold Methodology, revised July 2008.

⁷⁰ SCAQMD, Final—Methodology to Calculate Particulate Matter (PM) 2.5 and PM_{2.5} Significance Thresholds, October 2006.

⁷¹ SCAQMD, *CEQA Air Quality Handbook*, April 1993, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants).

⁷² Hazard index is the ratio of a toxic air contaminant's concentration divided by its Reference Concentration, or safe exposure level. If the hazard index exceeds one, people are exposed to levels of TACs that may pose noncancer health risks.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:21 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 8 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

between 1 in one million and 10 in one million, a project would result in a significant impact if the cancer burden exceeds 0.5 excess cancer cases.

7.5 Project Impacts

7.5.1 Consistency with Plans

7.5.1.1 Air Quality Management Plan

The air quality plan applicable to the Project area is the 2016 AQMP. The 2016 AQMP is the SCAQMD plan for improving regional air quality in the Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with State and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models. It also updates the federally approved 8-hour O₃ control plan with new commitments for short-term NO_x and VOC reductions. The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in the following analyses, the Project would not result in significant regional emissions. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour PM_{2.5} NAAQS for the Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NO_x reductions from residential appliances. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project Site is classified as “Medium Residential” in the General Plan Framework and the Community Plan, a classification that allows senior assisted living and dementia care uses, such as those proposed by the Project. As such, the RTP/SCS’ assumptions about growth in the City accommodate population and job growth on the Project Site. As a result, the Project would be consistent with the growth assumptions in the City’s General Plan.

Because the AQMP accommodates growth forecasts from local General Plans, the emissions associated with this Project are accounted for and mitigated in the region’s air quality attainment plans. The air quality impacts of development on the Project Site are accommodated in the region’s emissions inventory for the 2016 RTP/SCS and 2016 AQMP. While the 2020-2045 RTP/SCS has been adopted by SCAG as of September 2020, it has not been incorporated into the region’s air quality plan update expected in 2022. Therefore, Project impacts with respect to AQMP consistency would be less than significant.

7.5.1.2 City of Los Angeles Policies

The Project would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT, in addition to bicycle parking. In addition, the Project would be consistent with the existing land use pattern in the vicinity that concentrates

urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit.

These transit services include Metro local bus service (i.e., Lines 105 and 705 on La Cienega Boulevard two blocks east, Lines 20, 720, and 786 on Wilshire Boulevard, and Lines 28 and 728 on Olympic Boulevard two blocks to the south). The Project would also promote bicycle transportation by providing bicycle parking spaces, pursuant to LAMC section 12.21 A.4.

The Project would be consistent with applicable policies of the Air Quality Element. The Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

The City's General Plan Air Quality Element identifies 30 policies with specific strategies for advancing the City's clean air goals. As illustrated in **Table 7-5**, the Project is consistent with the applicable policies in the Air Quality Element. Therefore, the Project would result in less-than-significant impacts related to consistency with the Air Quality Element.

Table 7-5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	Consistent. The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules (e.g., Rule 403, Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	Consistent. The Project would minimize particulate emissions from unpaved facilities through best practices and/or SCAQMD rules.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	Consistent. The Project is a managed care facility for elders that would include up to 20 jobs for caregivers and administrators, some of whom could benefit from alternative work arrangements. Transit use will benefit from the substantial service in the vicinity of the project, including Metro local bus service (i.e., Lines 105 and 705 on La Cienega Boulevard two blocks east, Lines 20, 720, and 786 on Wilshire Boulevard, and Lines 28 and 728 on Olympic Boulevard two blocks to the south). The Project would also promote bicycle transportation pursuant to LAMC section 12.21 A.4. The project area also is considered "Very Walkable", with a WalkScore of 89 out of 100 points. ⁷³
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	Consistent. Some administrative employees supporting the office uses could use telecommuting to reduce work-related commuting. The Project would not impede the advancement of this Citywide policy.
Policy 2.2.1. Discourage single-occupant vehicle	Consistent. The proposed administrative

⁷³ <https://www.walkscore.com/score/825-s-holt-ave-los-angeles-ca-90035>, accessed March 15, 2020.

Table 7-5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	employees could offer and promote transportation options to employees as an option to driving to work. Residents would not drive.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	Consistent. The Project's limited on-site parking due to its proximity to public transit will by definition discourage single-occupant car use. There is substantial transit infrastructure in the vicinity of the Project, as noted under Policy 2.1.1.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	Not Applicable. The development would not host special events. The Project would not impede the advancement of this Citywide policy.
Policy 3.2.1. Manage traffic congestion during peak hours.	Consistent. The development would help manage peak-hour congestion by supporting use of alternatives to driving. There is substantial transit infrastructure in the vicinity of the Project, as noted under Policy 2.1.1.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	Consistent. The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	Consistent. The Project would be infill development that would provide employees with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The project would support use of alternative transportation modes such as bikes and transit.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project's air quality impacts are analyzed in this document, and as discussed herein, all impacts with respect to air quality would be less than significant.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	Consistent. The project would support use of alternative transportation modes such as bikes and transit.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	Not Applicable. This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or	Not Applicable. This policy calls for City updates to its General Plan.

Table 7-5
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Not Applicable. This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	Not Applicable. This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	Consistent. The Project would be consistent with this policy by complying with Title 24, CALGreen, and other requirements to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	Not Applicable. This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	Consistent. The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	Not Applicable. This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: DKA Planning, 2020.	

7.5.2 Emissions

7.5.2.1 Construction

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Fugitive dust emissions would primarily result from grading activities. NO_x emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As stated above, it is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM_{2.5} and PM₁₀ emissions associated with construction activities by approximately 61 percent. Demolition material and soils would be hauled away to an off-site landfill up to 25 miles in Puente Hills from the Project Site.

As shown in **Table 7-6**, construction of the Project would produce VOC, NO_x, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is less than significant.

Table 7-6
Estimated Daily Construction Emissions

Construction Phase Year	Daily Emissions (Pounds per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Year 1	2	33	14	<1	2	1
Year 2	4	11	14	<1	1	1
Maximum Regional Total	4	33	14	<1	2	1
Regional Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	4	15	15	<1	2	1
Localized Threshold	--	103	562	--	4	3
Exceed Threshold?	N/A	No	No	N/A	No	No
The construction dates are used for the modeling of air quality emissions in the CalEEMod software. If construction activities commence later than what is assumed in the environmental analysis, the actual emissions would be lower than analyzed because of the increasing penetration of newer equipment with lower certified emission levels. Assumes implementation of SCAQMD Rule 403 (Fugitive Dust Emissions)						
Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA County source receptor area.						

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.⁷⁴ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2018-2020) for the Project area.

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for the Central LA SRA based on construction site acreage that is less than or equal to one acre.

⁷⁴ SCAQMD, LST Methodology Appendix C-Mass Rate LST Look-up Table, revised October 2009.

As the Project Site is 0.41 acres in area, this acreage assumption is appropriate. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the residences directly north and south of the Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters.

As shown in **Table 7-6**, above, the Project would produce emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO₂ and CO during the construction phase. Similarly, construction activities would not produce PM₁₀ and PM_{2.5} emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACMs) that address fugitive dust emissions of PM₁₀ and PM_{2.5} through SCAQMD Rule 403. This would include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, construction impacts on localized air quality are less than significant.

7.5.2.2 Operation

Operational emissions of criteria pollutants would come from area, energy, and mobile sources. Area sources include natural gas for space heating and water heating, gasoline-powered landscaping and maintenance equipment, consumer products such as household cleaners, and architectural coatings for routine maintenance. The CalEEMod program generates estimates of emissions from energy use based on the land use type and size. The Project would also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site.

On a typical weekday, the Project is forecast to generate an estimated 218 net new daily trips, including 20 net new AM peak hour trips and 23 net new PM peak hour trips.⁷⁵

As shown in **Table 7-7**, the Project's net emissions would not exceed the SCAQMD's regional or localized significance thresholds and would generally result in a decrease in criteria pollutant emissions. Therefore, the operational impacts of the Project on regional and localized air quality are considered less than significant.

⁷⁵ DKA Planning 2020 using CalEEMod 2016.3.2 and Institute of Transportation Engineers Trip Generation Manual (10th Edition) time of day distribution for Assisted Living facilities (Land Use 254).

**Table 7-7
Estimated Daily Operations Emissions**

Emissions Source	Daily Emissions (Pounds per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	1	<1	9	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	3	8	<1	2	1
Regional Total	2	3	17	<1	2	1
Existing Sources	<1	<1	-1	<1	<1	<1
Net Regional Total	2	3	16	<1	2	1
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	2	1	3	<1	<1	<1
Localized Significance Threshold	N/A	103	562	--	1	1
Exceed Threshold?	No	No	No	No	No	No
LST analyses based on 1-acre site with 25-meter distances to receptors in Northwest Coastal LA SRA Source: DKA Planning, 2020 based on CalEEMod 2016.3.2 model runs (included in the Appendix).						

7.5.3 Sensitive Receptors

7.5.3.1 Construction

Construction of the Project could expose sensitive receptors to substantial pollutant concentrations if maximum daily emissions of regulated pollutants generated by sources located on and/or near the Project Site exceeded the applicable LST values presented in **Table 7-4**, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. As discussed above, the LST values were derived by the SCAQMD for the criteria pollutants NO_x, CO, PM₁₀, and PM_{2.5} to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown in **Table 7-6**, above, during construction of the Project, maximum daily localized unmitigated emissions of NO₂, CO, PM₁₀, and PM_{2.5} from sources on the Project Site would remain below each of the respective LST values. Unmitigated maximum daily localized emissions would not exceed any of the localized standards for receptors that are within 25 meters of the Project's construction activities. Therefore, based on SCAQMD guidance, localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Site would be operating simultaneously throughout most of the day, while in all likelihood this would rarely be the case.

Average daily emissions of diesel PM would be less than one pound per day throughout the course of Project construction. Therefore, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 30-year period will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 29 months, and the magnitude of daily diesel PM emissions will vary over this time period. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, construction TAC emissions would result in a less than significant impact. Therefore, construction of the Project would not expose sensitive receptors to substantial diesel PM concentrations, and this impact would be less than significant.

7.5.3.2 Operation

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

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. CARB has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).⁷⁶

The SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning.⁷⁷ Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and

⁷⁶ CARB, Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.

⁷⁷ SCAQMD, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.

warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions.⁷⁸ Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated airborne toxic control measures (ATCM) limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time, which would further limit diesel particulate emissions.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO₂, PM_{2.5}, or PM₁₀ at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.⁷⁹

The Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.⁸⁰ However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.⁸¹ The Project would not generate a substantial number of truck trips. Based on the limited activity of

⁷⁸ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.

⁷⁹ Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

⁸⁰ California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. [www.http://oehha.ca.gov/public_info/facts/dieselfacts.html](http://oehha.ca.gov/public_info/facts/dieselfacts.html)

⁸¹ SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, the Project's operational impacts on local sensitive receptors would be less than significant.

7.5.4 Odors

The Project would not result in activities that create objectionable odors. The Project is a eldercare development that would not include any activities typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors. As a result, any odor impacts from the Project would be considered less than significant.

7.6 Conclusion

For all the foregoing reasons, the Project would comply with CCR Section 15332(d) in that it would not have a significant impact related to air quality.

8 Discussion of CCR Section 15332(d): Water Quality

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.⁸²

8.1 Surface Water Quality

8.1.1 Construction

Construction activities such as earth moving, maintenance of construction equipment, and handling of construction materials can contribute to pollutant loading in stormwater runoff. Site-specific BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Project Applicant would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion.

During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur.

As Project construction would disturb less than one acre of soil (Site is 0.178 acres), the Project would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. However, the Project would be required to implement Best Management Practices (BMPs) as part of the City's grading permit requirements. BMPs would include, but would not necessarily be limited to, erosion control, sediment control, non-stormwater management, and materials management BMPs (e.g., sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management) to minimize the discharge of pollutants in stormwater runoff during construction.

In addition, Project construction activities would occur in accordance with City grading permit regulations (LAMC Chapter IX, Division 70), such as the preparation of an Erosion Control Plan, to reduce the effects of sedimentation and erosion. With the implementation of site-specific BMPs included as part of the Erosion Control Plan required to comply with the City grading permit regulations, the Project would significantly reduce or eliminate the discharge of potential pollutants from the stormwater runoff. Therefore, with compliance with City grading regulations, construction of the Project would not violate any water quality standard or waste discharge requirements or otherwise substantially degrade surface water quality.

With compliance with regulations in place, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a

⁸² Each of these topic areas (traffic, noise, air quality, and water quality) is discussed in its own section.

hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, such mandatory compliance measures would ensure that construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Los Angeles River Watershed. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

8.1.2 Operation

Under the City's Low Impact Development (LID) Ordinance, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the greater of the 85th percentile storm event or the 0.75-inch storm event (i.e., "first flush"). Consistent with LID requirements to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of capture and use and/or biofiltration system BMPs as established by the LID Manual. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. As the majority of potential contaminants are anticipated to be contained within the "first flush" storm event, major storms are not anticipated to cause an exceedance of regulatory standards. As is typical of most urban existing uses and proposed developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project are sediment, nutrients, pesticides, metals, pathogens, and oil and grease.

The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated.

The existing site is nearly impervious and consists of buildings, paved driveways, and landscape areas. Implementation of the Project would slightly increase the impervious surface. The Project Site does not appear to include BMPs or measures to treat stormwater runoff.

As such, stormwater currently flows from the Project Site without any treatment. However, the Project includes compliance with LID BMPs, such as the installation of a capture and use and/or biofiltration system, which would control stormwater runoff with no increase in runoff resulting from the Project. Therefore, with the incorporation of such LID BMPs, operation of the Project would not result in discharges that would violate any surface water quality standards or waste discharge requirements. Impacts to surface water quality during operation of the Project would be less than significant.

8.2 Ground Water Quality

8.2.1 Construction

In the event groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with all applicable NPDES requirements. The treatment and

disposal of the dewatered water would occur in accordance with the Los Angeles Regional Water Quality Control Board (LARWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. Therefore, construction could potentially improve the existing condition by removing impacted groundwater.

In addition, the construction activities would be typical of a residential and office project and would not involve activities that could further impact the underlying groundwater quality.

Further, compliance with all applicable federal, State, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant.

8.2.2 Operation

The Project does not include the installation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project Site would not increase concentrations of trash in the Los Angeles River Watershed because it would not dump trash into the storm drain system. The Project would meet the requirements of the City's LID standards. Under section 3.1.3. of the LID Manual, post-construction stormwater runoff from new projects must be infiltrated, evapotranspired, captured and used, and/or treated through high efficiency BMPs on-site for the volume of water produced by the 85th percentile storm event. The Project would implement either Infiltration Drywells, Capture and Use System, or Biofiltration Planters for managing stormwater runoff in accordance with current LID requirements.

Water runoff flows south along Holt Avenue and west along Chalmers Drive toward the existing storm drain system with an inlet on Le Doux Road.⁸³

Through required compliance with the City's LID Ordinance, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Los Angeles River) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The release of pollutants listed above would be reduced or minimized through the implementation of approved LID BMPs.

⁸³ NavigateLA, Stormwater layer: <http://navigatea.lacity.org/navigatea/>

The Project does not include the installation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Operational activities, which could affect groundwater quality, include hazardous material spills and leaking underground storage tanks. No underground storage tanks will be operated by the Project.

The Project would not expand any potential areas of contamination, increasing the level of contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. The Project is not anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. The Project does not involve drilling to or through a clean or contaminated aquifer.

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. Stormwater infrastructure on the Project Site, in compliance with LID BMP requirements, would control and treat stormwater runoff to account for the 85th percentile storm event. The installed BMP systems would be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Implementation of LID BMPs would ensure operational impacts on surface water quality are less than significant. Therefore, the Project's potential impact on surface water quality and groundwater quality is less than significant.

The Project Site is completely developed with a building and has minimal landscape pervious areas that do not have any LID systems. Implementation of a development that complies with the current requirements of the LID ordinance and handbook would actually improve the condition of the Site. Therefore no significant impact would occur.

8.3 Conclusion

For all the foregoing reasons, the Project would comply with CCR Section 15332(d) in that it would not have a significant impact related to water quality.

9 Discussion of CCR Section 15332(e)

The site can be adequately served by all required utilities and public services.⁸⁴

9.1 Fire Protection

Within the City of Los Angeles, fire prevention and suppression services and emergency medical services are provided by the Los Angeles Fire Department (LAFD). Project impacts regarding fire protection services are evaluated on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements, as well as project design features that would reduce or increase the demand for fire protection and emergency medical services, are taken into consideration.

Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. The evaluation of the Project's impact on fire protection services considers whether the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand, the construction of which would cause significant environmental impacts.

The Project would comply with all applicable regulatory standards. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 of the LAMC regarding fire flow requirements.

LAMC Chapter V, Article 7, Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

According to LAMC Section 57.512.1,⁸⁵ response distances based on land use and fire-flow requirements shall comply with Table 57.507.3.3 (recreated below).⁸⁶

This Project would be a high density development. For a high density residential land use, the maximum response distance is 1.5 mile for an engine company and 2 miles for a truck company. The maximum response distances for both fire suppression companies (engine and

⁸⁴ Each of these topic areas (public services [fire, police, schools, parks, libraries] and utilities [wastewater, water, solid waste]) are discussed in their own section.

⁸⁵ LAMC Section 57,512.1,
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512).

⁸⁶ LAMC Table 57,507.3.3,
[http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.507.3.3](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.507.3.3)

truck) must be satisfied. According to LAMC Section 57.512.2⁸⁷, where a response distance is greater than that shown in Table 57.507.3.3 (table recreated below), all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

Table 57.507.3.3
Response Distances That If Exceeded Require The Installation Of An Automatic Fire Sprinklers System

* Land Use	Required Fire-Flow	Maximum Response Distance	
		Engine Co.	Truck Co.
Low Density Residential	2,000 gpm from three adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
High Density Residential and Commercial Neighborhood	4,000 gpm from four adjacent hydrants flowing simultaneously	1-1/2 miles	2 miles
Industrial and Commercial	6,000 to 9,000 gpm from four hydrants flowing simultaneously	1 mile	1-1/2 miles
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, an additional 2,000 to 8,000 gpm will be required)	3/4 mile	1 mile
gpm – gallons per minute Land use designations are contained in the community plan elements of the General Plan. Maximum response distances for both fire suppression companies (engine and truck) must be satisfied. LAMC Table 57.507.3.3.			

LAFD apparatus consists of the following:

- LAFD Engine Company (E) – All LAFD Fire Stations includes at least one Engine. This basic firefighting apparatus has three components; water tank, high capacity water pump, and hose.
- LAFD Assessment Engine (AE) – The Assessment Engine is capable of responding to both medical incidents requiring Advanced Life Support (ALS) capabilities or a fire emergency. These apparatus are staffed with at least one assigned Paramedic Firefighter, one Fire Captain, Engineer and EMT Firefighter.
- LAFD Truck Company (T) – Typically housed with and accompanied by an Engine, the Truck carries a hydraulically operated 100-foot aerial ladder, and specialized tools and equipment used for rescue, ventilation, forcible entry, salvage, and overhaul operations. They do not carry water. A Fire Captain II, an Apparatus Operator (A/O) driver, two Firefighters and a fifth member, the Tiller who steers the rear wheels, staff the Truck.

⁸⁷ LAMC [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangelescamc\\$anc=JD57.512.2](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode/chaptervpublicsafetyandprotection/article7fireprotectionandpreventionfirec?f=templates$fn=default.htm$3.0$vid=amlegal:losangelescamc$anc=JD57.512.2).

- Task Force (TF) – Normally comprised of three apparatus: an Engine Company, a Truck (Aerial Ladder) Company and a second Engine called a “Pump”. These apparatus run together so that they operate with maximum flexibility.
- Light Force (LF) – A subset of the Task Force, including an Engine and a Truck.
- Assessment Light Force (ALF) – An Assessment Light Force (ALF) is staffed with a Paramedic. These companies provide Advance Life Support (ALS) and mitigate fire emergency.
- Basic Life Support (BLS) Ambulance – The Firefighters assigned to these rescue are certified by the State California as Emergency Medical Technicians (EMT). EMTs are capable of providing first, basic airway management, assisting patient’s administer some of their personal medication and CPR. LAFD Firefighters are also trained to apply the Automatic External Defibrillator (AED). NOTE: If the proposed Plan is approved, the LAFD will add additional “Ready Reserve” RA’s across the City. RAs will be placed in Fire Stations where EMS responses are highest. Whenever additional EMS resources are needed in response to a single catastrophic event or an extraordinary increase in service, the LAFD dispatch protocol can provide the flexibility to reconfigure resources.
- Advanced Life Support (ALS) Ambulance – The Firefighters assigned to these rescue are licensed by the State of California as Paramedics. Paramedics provide advanced first aid, start IVs, administer a variety of medications by IV, injection and other routes, utilize advanced airway management tools, and perform defibrillation and synchronized cardioversion.

According to the City, the Project Site is first-served by Station No. 58⁸⁸, located at 1556 Robertson Boulevard, approximately 1.0 mile driving distance away.

Additionally, Beverly Hills Station No. 3, located 180 Doheny Drive, approximately 4,500 feet driving distance. It could help the LAFD through a mutual aid agreement.

As shown in **Table 9-1**, Fire Station No. 58 has an assessment engine but not a truck company.

Since the Project Site is located outside the distance identified by LAMC Section 57.507.3.3, all structures shall be constructed with automatic fire sprinkler systems. Additional fire protection shall be provided as required by the Fire Chief per LAMC Section 57.512.2.

The Project Site is in an urbanized area completely surrounded by development. The Project Site is not located in a Very High Fire Hazard Severity Zone⁸⁹ or in the wildlands fire hazard Mountain Fire District.⁹⁰

The Project Site is accessible by emergency vehicles from a number of major roadways.

⁸⁸ LAFD, Find Your Station: <https://www.lafd.org/fire-stations/station-results>

⁸⁹ ZIMAS search: <http://zimas.lacity.org/>.

⁹⁰ Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed October 22, 2021.

**Table 9-1
Fire Stations**

No.	Address	Distance	Equipment	Operational Response Time	Incident Counts
58	1556 Robertson Boulevard	1.0 mile	Assessment Engine Paramedic Ambulance Rescue Ambulance Advanced Practitioner	EMS: 7:03 min Non-EMS: 6:48 min	EMS: 3,679 Non-EMS: 858
<p>Response Time: (January to Sept 2021) average time (turnout time + travel time) in the station area. Incident counts: (January to Sept 2021). Non-EMS is fire emergency. EMS is emergency medical service. http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf Light Force: Truck company and single engine. Task Force: Truck company and two fire engines. LAFD: http://www.lafd.org/about/about-lafd/apparatus. LAFD June 2021 Fire Station Directory. Table: CAJA Environmental Services, October 2021.</p>					

LAMC Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas, with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development. Final fire flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project by LAFD during the plan check process. If the Project is determined to require one or more new hydrants during plan check in accordance with city standards, the Project would have to provide them.

The following fire hydrants are near the Project Site:⁹¹

- Hydrant (ID 40944, size 2½ x 4D, 6-inch main), west side of Holt Avenue, adjacent to Site.
- Hydrant (ID 34102, size 2½ x 4D, 6-inch main), southwest corner of Holt Avenue and Gregory Way, north of the Site.
- Hydrant (ID 34103, size 2½ x 4D, 6-inch main), southwest corner of Holt Avenue and Chalmers Drive, south of the Site.

If the Project is determined to require one or more new hydrants during plan check, the Project would have to provide them.

⁹¹ Navigate LA, DWP (Fire Hydrants) Layer: <http://navigate.la.city.org/navigate/>

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁹²

For all the foregoing reasons, the Project would be adequately served by the LAFD.

9.2 Police Protection

The Project Site is served by the City of Los Angeles Police Department’s (LAPD) West Bureau, West Los Angeles Community Police Station, located at 1663 Butler Avenue.⁹³ The Community is 65.14 square miles in size, has approximately 228,000 residents, and has approximate 260 sworn officers. The officer to resident ratio is 1:876.⁹⁴ The Station is approximately 5.2 miles driving distance from the Project Site.

The Project includes 94 beds and thus would add 94 residents. Assuming the same officer to resident ratio, the Project would represent approximately 10% of 1 officer.

This increase is negligible and represents less than 1% increase compared to the number of existing officers. The Project will contribute property tax revenue into the City’s General Fund, which can be used to fund additional resources per the planning and deployment strategies of the LAPD.

During construction, the open sides on the Project Site would need to be secured to prevent trespass and theft of building materials. The Project Applicant would employ construction security features, such as fencing, which would serve to minimize the need for LAPD services. Temporary construction fencing would 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 potential for crime can be reduced with site-specific designs and features. The Project would include standard security measures such as adequate security lighting, secure access to

⁹² City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

⁹³ LAPD, West LA Station: <https://www.lapdonline.org/lapd-contact/west-bureau/west-los-angeles-community-police-station/>

⁹⁴ 228,000 persons / 260 = 876.

non-public areas and residential access points. Parking would be in a subterranean parking level integrated into the building. The LAPD will require that the commanding officer of the Station be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response.

The Project would also provide security features including, but not limited to, controlled access to on-site parking areas and building entries, particularly after regular business hours, video surveillance, and security lighting.

Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by voters in 1993 pursuant to Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with Proposition 172 to ensure that public safety services are provided.⁹⁵

For all the foregoing reasons, the Project would be adequately served by the LAPD.

9.3 Schools

The Project is served by the following Los Angeles Unified School District (LAUSD) schools:⁹⁶

- Elementary (grades K-5): Cathay Elementary, 6351 Olympic Boulevard
- Middle (grades 6-8): Emerson Community Charter, 1650 Selby Avenue
- High (grades 9-12): Fairfax Senior High, 7850 Melrose Avenue

The eldercare facility does not directly generate students and the employees indirectly generate students through their families. As shown in **Table 9-2**, the Project would generate approximately 5 students. This is a conservative amount that does not take credit for the existing uses on the Site.

However, pursuant to the California Government Code Section 65995⁹⁷ and California Education Code Section 17620⁹⁸, mandatory payment of the school fees established by LAUSD

⁹⁵ City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

⁹⁶ <https://rsi.lausd.net/ResidentSchoolIdentifier/>

in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address and mitigate any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant with compliance with regulatory requirements to pay school fees pursuant to the Government Code.

For all the foregoing reasons, the Project would be adequately served by the LAUSD.

Table 9-2
Estimated Student Generation

Land Use	Project Amount	Student Generation			
		Elementary	Middle	High	Total
Eldercare	80 guest rooms	0	0	0	0
Employees	20 employees	3	1	2	5
Total		3	1	2	5
LAUSD Developer Fee Justification Study, March 2020. Students per household: 0.2269 elementary, 0.0611 middle; 0.1296 high school. Students per employee: 0.2354. Since the Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the residential generation factors (i.e. approximately 54.3 percent for elementary, 14.6 percent for middle, and 31.0 percent for high school. Table: CAJA Environmental Services, October 2021.					

9.4 Parks

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons).

The Project would increase the number of residents and employees at the Project Site. However, employees do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include common open space areas. The residents of the eldercare facility would not utilize nearby parks and recreation facilities.

Therefore, no impacts would occur.

9.5 Other Public Facilities

The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL

⁹⁷ California Government Code Section 65995,
<https://leginfo.ca.gov/faces/codesdisplaySection.xhtml?lawCode=GOV§ionNum=65995>

⁹⁸ California Education Code Section,
[17620https://leginfo.ca.gov/faces/codesdisplaySection.xhtml?lawCode=EDC§ionNum=17620](https://leginfo.ca.gov/faces/codesdisplaySection.xhtml?lawCode=EDC§ionNum=17620)

collection has 7.1 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.⁹⁹

Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours. The Project will include an onsite library. The residents of the eldercare facility would not utilize nearby libraries.

Therefore, no impacts would occur.

9.6 Wastewater

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd.¹⁰⁰ Thus, there is approximately 175 mgd available capacity.

As shown on **Table 9-3**, the Project would generate a net total of approximately 6,580 gallons of wastewater per day (or 0.007 mgd). This total does not take credit for removal of the existing uses. This total does not take any credit for any proposed sustainable and water conservation features of the Project. This is a worst-case, conservative approach.

With a remaining daily capacity of 175 mgd, the HTP would have adequate capacity to serve the Project's projected 0.007 mgd generation.

The sewer infrastructure in the vicinity of the Project includes an existing 8-inch line on Holt Avenue to a 8-inch line on Olympic Boulevard.¹⁰¹

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. This will ensure that the Project's impacts to the wastewater conveyance system would be less than significant.

Therefore, no Project impacts related to wastewater treatment would occur and the Project would be adequately served by the City's wastewater facilities.

⁹⁹ LAPL website: <https://www.lapl.org/sites/default/files/media/pdf/about/LAPLFY2017-18Backgroundunder10022018.pdf>

¹⁰⁰ <https://www.lacitysan.org/san/faces/wcnavexternalld/s-lsh-wwd-cw-p-hwrp?adf.ctrlstate=e9g2enwiy5&afrLoop=2223629005130851#!>

¹⁰¹ Navigate LA, (Sewer Information layer) Layer: <http://navigatela.lacity.org/navigatela/>

Table 9-3
Estimated Wastewater Generation

Land Use	Size	Rates	Total (gpd)
Assisted Living Care	72 beds	70 gallons / bed	5,040
Memory Care	22 beds	70 gallons / bed	1,540
Total			6,580
Note: sf = square feet; gpd = gallons per day			
Rates: Los Angeles Bureau of Sanitation, Sewage Generation Factor, effective date April 6, 2012.			
Table: CAJA Environmental Services, October 2021.			

9.7 Water

The City receives water from five major sources: 1) the Eastern Sierra Nevada watershed, via the Los Angeles Aqueduct; 2) the Colorado River, via the Colorado River Aqueduct; 3) the Sacramento- San Joaquin Delta, via the State Water Project and the California Aqueduct; 4) local groundwater; and 5) recycled water. The amount of water obtained from these sources varies from year to year and is primarily dependent on weather conditions and demand. Los Angeles Department of Water and Power (LADWP) has adopted the 2015 Urban Water Management Plan to ensure that existing and projected water demand within its service area can be accommodated. According to the LADWP, for any project that is consistent with the City's General Plan, the projected water demand associated with that project is considered to be accounted for in the 2020 Urban Water Management Plan.

As was shown in the Land Use analysis of this Categorical Exemption, the Project would be consistent with the City's General Plan land use designation for the Project Site. Additionally, the Project Applicant would be required to comply with the water efficiency standards outlined in City Ordinance No. 180822¹⁰² and in the LAGBC¹⁰³ to minimize water usage. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not require new or additional water supply or entitlements. Therefore, no Project impacts related to water supply would occur and the Project would be adequately served by the LADWP.

The 2020 UWMP was adopted in May 2021 and projects a demand of 642,600 AFY in 2025 (average weather year).¹⁰⁴ The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2020-2045 RTP/SCS.¹⁰⁵ The 2020-2045 RTP/SCS models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life

¹⁰² <http://clkrep.lacity.org/online/docs/2009/09-0510ord180822.pdf>

¹⁰³ <http://www.ladbs.org/forms-publications/forms/green-building>

¹⁰⁴ 2020 Urban Water Management Plan, Los Angeles, Exhibit ES-S.

¹⁰⁵ 2020 Urban Water Management Plan, Los Angeles, page 1-5.

expectancy).¹⁰⁶ Neither the UWMP forecasts, nor the 2020-2045 RTP/SCS include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit.

The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

As shown on **Table 9-4**, the Project would demand a net total of approximately 6,580 gallons of water per day (or 0.007 mgd). This total does not take credit for removal of the existing uses. This total does not take any credit for any proposed sustainable and water conservation features of the Project. This is a worst-case, conservative approach.

With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project's projected demand for treatment of 0.007 mgd. Therefore, no Project impacts related to water treatment would occur and the Project would adequately served by existing treatment facilities.

The existing LADWP water infrastructure would be adequate to provide for the water flow necessary to serve the Project. Thus, no upgrades to the mainlines that serve the Project Site would be required. However, the Project would require new service lines to connect to the existing water mainlines adjacent to the Project Site. The proposed service is anticipated to connect to the 6-inch water main in the Holt Avenue right-of-way. The required connection point will be determined by LADWP and will be based on available capacity. The design and installation of new service connections would be required to meet applicable City standards and would be able to receive adequate fire and domestic service water usage. Minor off-site construction work associated with trenching would occur, resulting in partial street closures along Holt Avenue adjacent to the Project Site.

However, such closures would be temporary in nature and would not result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the Project construction activities. A Worksite Traffic Control Plan would be implemented during Project construction to ensure that adequate and safe access remains available within and near the Project Site during construction activities. In addition, prior to conducting any ground disturbing activities, Project contractors would coordinate with LADWP to identify the locations and depths of existing water lines in the Project Site vicinity to avoid disruption of water service.

¹⁰⁶ SCAG, 2020-2045 RTP/SCS, Demographic and Growth Forecast, page 3.

Table 9-4
Estimated Water Demand

Land Use	Size	Rates	Total (gpd)
Assisted Living Care	72 beds	70 gallons / bed	5,040
Memory Care	22 beds	70 gallons / bed	1,540
Total			6,580
Note: sf = square feet; gpd = gallons per day Wastewater generation is assumed to equal water consumption. Per the LADWP: “For estimating a project’s indoor water demand, we use applicable sewer generation factors (sgf).” Rates: Los Angeles Bureau of Sanitation, Sewage Generation Factor, effective date April 6, 2012. Table: CAJA Environmental Services, October 2021.			

9.8 Solid Waste

9.8.1 Environmental Setting

County landfills are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.¹⁰⁷ Ten Class III landfills and one unclassified landfill with solid waste facility permits are currently operating within the County.¹⁰⁸

Based on the information provided in the 2019 Countywide Integrated Waste Management Plan Annual Report, the remaining disposal capacity for the County’s Class III landfills is estimated at approximately 148.40 million tons.¹⁰⁹ In 2019, approximately 5.228 million tons of solid waste were disposed of at the County’s Class III landfills, 0.207 million tons of inert waste at the County’s inert landfill, and 0.337 million tons at transformation facilities.¹¹⁰

Of the remaining Class III landfill capacity in the County, approximately 76.08 million tons are available to the City.¹¹¹ As is the case with solid waste haulers, landfills operate in a free-enterprise system. Their operating funds and profits are obtained by collecting disposal fees from the haulers on a per ton basis. Landfill capacity is regulated primarily through the amount

¹⁰⁷ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

¹⁰⁸ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed October 22, 2021.

¹⁰⁹ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed October 22, 2021.

¹¹⁰ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed October 22, 2021.

¹¹¹ Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Scholl Canyon, Whittier, Burbank, Pebbly Beach, and San Clemente). In addition, total excludes the Calabasas Landfill, as its watershed does not include the Project Site. The Chiquita Canyon Landfill Expansion permits the facility to operate until it reaches 60 million tons, or after 30 years, whichever comes first. However, since the current volume of the facility’s watershed is unknown, the volume of waste that it would take to reach 60 million tons cannot be determined. As such, for a conservative analysis, the Chiquita Canyon Landfill Expansion is excluded from the total.

of solid waste that each particular facility is permitted to collect on a daily basis relative to its capacity.

The 2019 Annual Report indicates that the countywide cumulative need for Class III landfill disposal capacity, approximately 154.3 million tons in 2032, will exceed the 2019 remaining permitted Class III landfill capacity of 148.4 million tons. Watershed boundaries, geographic barriers, weather, and natural disasters could place further constraints on accessibility of Class III landfill capacity. Therefore, the Annual Report evaluated seven scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with six of the seven scenarios. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling, expand existing landfills, promote and develop alternative technologies, expand transfer and processing infrastructure, and use out of county disposal, including waste by rail.

The County's unclassified landfill generally does not currently face capacity issues. The remaining disposal capacity for Azusa Land Reclamation is estimated at approximately 58.84 million tons. In 2019, approximately 0.266 million tons of inert waste (e.g., soil, concrete, asphalt, and other construction and demolition debris) were disposed of at this unclassified landfill. Given the remaining permitted capacity, this capacity would be exhausted in 221 years.¹¹² Thus, the unclassified landfill serving the County has adequate long-term capacity.

While the City's Bureau of Sanitation (BOS) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill.

In 2018, the City disposed of approximately 3.3 million tons of solid waste at the County's Class III landfills, approximately 1,968 tons at transformation facilities, and 214 million tons at the inert landfill.¹¹³ The 3.3 million tons of solid waste accounts for approximately 4.3 percent of the total remaining capacity (76.08 million tons) for the County's Class III landfills open to the City.¹¹⁴

9.8.2 Project Impacts

9.8.2.1 Construction

As shown in **Table 9-5**, the Project would result in approximately 800 tons of construction and demolition waste, not accounting for any mandatory recycling. For a conservative approach, the modeling included the demolition of the existing building.

¹¹² County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2019 Annual Report, September 2020, Appendix E-2 Table 4: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>, accessed October 22, 2021.

¹¹³ These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

¹¹⁴ $3.3 \text{ million tons} \div 76.08 \text{ million tons} \times 100\% = 4.3\%$.

Table 9-5
Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Demolition Waste			
Residential	10,617	127 pounds / sf	675
Non-residential	0	158 pounds / sf	0
Asphalt	0	75 pounds / sf	0
Construction Waste			
Residential	56,796 sf	4.39 pounds / sf	125
Non-residential	0	4.34 pounds / sf	0
Total			800
Over the entire total schedule of construction. Numbers have been rounded. sf = square feet, 1 ton = 2,000 lbs U.S. Environmental Protection Agency, Report No. EPA530-R-09-002, Estimating 2003 Demolition and Materials Amounts, March 2009, Table 2-1, Table 2-2, Table 2-3, Table 2-4: https://www.epa.gov/smm/estimating-2003-building-related-construction-and-demolition-materials-amounts 1 cubic foot of asphalt weighs 150 pounds. The asphalt at the site is assumed to be 6 inches thick. Table: CAJA Environmental Services, October 2021.			

Pursuant to the requirements of Senate Bill 1374¹¹⁵, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

Given the remaining permitted capacity the Azusa Land Reclamation facility, as well as the remaining capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

9.8.2.2 Operation

As shown on **Table 9-6**, the Project would generate a net total of approximately 86 tons per year of solid waste. This total does not take credit for removal of the existing uses.

The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate 4 cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices.

The Project will include centralized on-site trash collection for both refuse and recyclable materials, in conformance with the LAMC. All trash and recycling areas are conditioned to be enclosed and not visible to the public. Trash collection will occur within one trash room located on the second and lowest subterranean level. The trash room is not visible from the public right-of-way.

¹¹⁵ <https://www.calrecycle.ca.gov/lgcentral/library/canddmodel/instruction/sb1374>

Table 9-6
Estimated Solid Waste Generation

Land Use	Size	Rates	Total (Tons per year)
Eldercare	94 persons	5 pounds / person/ day	86
Note: 1 ton = 2,000 pounds. 1 year = 365 days. https://www2.calrecycle.ca.gov/wastecharacterization/general/rates Table: CAJA Environmental Services, October 2021.			

Likewise, the analysis does not include implementation of the City's Zero Waste Plan, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025, 95% by 2035, and zero waste by 2030.¹¹⁶

The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.0002 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.¹¹⁷ Based on the above, the landfills that serve the Project Site have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project. Therefore, no Project impacts related to solid waste would occur and the Project would adequately served by existing facilities.

9.9 Conclusion

For all the foregoing reasons, the Project would comply with CCR Section 15332(e) in that there would be adequate utilities and public services available to the Project Site.

¹¹⁶ The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan, and City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn 2019. <https://plan.lamayor.org/sites/default/files/pLAn2019final.pdf>, accessed October 22, 2021.

¹¹⁷ $(94 \text{ tons per year} / 76.08 \text{ million tons per year}) \times 100 = \sim 0.0002\%$

10 Guideline 15300.2. Exceptions: (a) Location.

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

The Project is seeking a Class 32 Exemption, not a Class 3, 4, 5, 6, or 11 exemption. The Project is within an in-fill urban area of the City. There is no specific sensitive environmental condition that could occur nor environmental resource of hazardous or critical concern at the Project Site.

Therefore, this exception to a categorical exemption for the Project does not apply.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:34 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 9 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

11 Guideline 15300.2. Exceptions: (b) Cumulative Impact.

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

The following related project is known immediately around the Project Site:

- 843-847 Sherbourne Drive, a proposed 56-unit eldercare development, 200 feet southwest of the Project Site. This related project is separated from the Project Site by an existing adjacent 2-story building.

Each related projects would be subject to their own CEQA analysis to evaluate potential impacts and provide mitigation measures where appropriate. Any other related projects are further away from the Project Site and have intervening buildings and major roadways between them and the Project Site. Distances ensure that any other localized impacts of the related project would not combine with the Project.

11.1 Transportation

Any related projects would be required to submit any applicable construction staging and traffic control plans for review and approval by the City prior to the issuance of construction permits. The plan would identify all traffic control measures, signs, delineators, and work instructions through the duration of construction activities. It is reasonably anticipated that the related projects would comply with a similar plan, and as such, the cumulative construction traffic impact would be less than significant and no mitigation measures are required.

According to the TAG, cumulative effects are determined through a consistency check with SCAG's RTP/SCS. The Project would be consistent with the RTP/SCS. Additionally, the TAG states that "projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e. VMT per capita or VMT per employee)" is sufficient in demonstrating less than significant cumulative VMT and greenhouse gas reduction goals of the RTP/SCS.

11.2 Noise

11.2.1 Construction

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

There is a potential development approximately 200 feet southwest of the Project Site at 843-847 Sherbourne Drive that could generate construction noise concurrent with the Project. That project could remove 12 existing residences and construct eight memory care units and 48 assisted living units. When combined with existing ambient noise levels, concurrent construction

noise from these two projects was modeled assuming the highest noise generating uses during construction of the two projects would occur simultaneously, the results of which demonstrated that the combined effect of the two projects would not substantially elevate ambient noise levels by 5 dBA L_{eq} or more, the results of which are presented on **Table 11-1**. Therefore, this related project's remaining construction activities would not result in cumulatively considerable on-site noise impacts with the Project. **Figure 11-1** illustrates the noise contours of both construction sites on the local terrain.

Table 11-1
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors

Building	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase	Significant ?
1. 821 South Holt Avenue	54.3	52.4	56.5	4.1	No
2. Margaret Herrick Library	37.0	65.9	65.9	0.0	No
3. La Cienega Park	36.8	71.4	71.4	0.0	No
4. 250 La Cienega Medical	30.8	68.8	68.8	0.0	No
5. Sherbourne Avenue	54.0	53.8	56.9	3.1	No
Source: DKA Planning 2021					

Construction-related noise levels from this or any other related projects would be intermittent and temporary, and it is anticipated that, as with the Project, any related projects would comply with the LAMC's restrictions, including construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Based on this, there would not be cumulative noise impacts at any nearby sensitive uses located near the Project Site and related projects in the event of concurrent construction activities.

As such, there would not be a significant cumulative noise impact at any nearby sensitive receptors located near the Project Site and related projects in the event of concurrent construction activities.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:35 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 10 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

Figure 11-1
Cumulative Construction Noise Contours



Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:36 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 11 of 20.
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11.2.2 Operation

Haul trucks would have a potential to result in cumulative impacts to off-site noise levels if the haul trucks, vendor trucks, or worker trips for the related project on Sherbourne Drive were to utilize the same routes. These two cumulative developments would not more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. For example, cumulative truck and vehicle travel on Olympic Boulevard would have to double the existing 3,808 vehicles on La Cienega Boulevard at Olympic Boulevard in the AM. peak hour or 3,101 trips during the PM. peak hour just to increase ambient noise levels by 3 dBA L_{eq} .¹¹⁸ The Project and related project would generate a minimal amount of traffic on La Cienega and other local streets in the area. Therefore, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be less than significant.

The Project Site and surrounding neighborhood have been developed with residential and commercial uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, any related projects in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. Given the commercial zoning of La Cienega and Olympic Boulevards, any related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Project. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Project. Given the residential and commercial zoning in the vicinity of the Project Site, no substantial sources of operational noise (e.g., heavy-duty diesel equipment) are expected to generate any meaningful long-term noise. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

The Project and any related projects within 1,000 feet of the Project Site would produce traffic volumes (off-site mobile sources) that would generate roadway noise. On a typical weekday, the Project would generate 315 average daily vehicle trips.¹¹⁹ The related project on Sherbourne Drive would generate an additional 55 daily vehicle trips. These increases represent no more than one percent of traffic on La Cienega or Olympic Boulevards. Because it takes a doubling of traffic volumes to increase ambient noise levels by 3 dBA L_{eq} , neither the Project's traffic impact nor cumulative traffic impacts would not increase ambient noise levels on these roads. Therefore, cumulative noise impacts due to off-site traffic noise would be less than significant.

¹¹⁸ Los Angeles Department of Transportation. Manual Traffic Count Summary, 2018.

https://navigatela.lacity.org/dot/traffic_data/automatic_counts/OLYMPIC.LACIENEGA.180417-AUTO.pdf

¹¹⁹ DKA Planning 2020 based on the CalEEMod model using ITE Trip Generation Manual (9th Edition) factors.

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

11.3 Air Quality

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.¹²⁰ Individual projects that generate emissions not in excess of SCAQMD’s significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

11.3.1 AQMP Consistency

Cumulative development is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of the 2016 AQMP. As discussed previously, growth considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified in the 2016 RTP/SCS, implementation of the AQMP will not be obstructed by such growth. In addition, as discussed previously, the population growth resulting from the Project would be consistent with the growth projections of the AQMP. Each related project would implement feasible air quality mitigation measures to reduce the criteria air pollutants, if required due to any significant emissions impacts. In addition, each related project would be evaluated for its consistency with the land use policies set forth in the AQMP. Therefore, the Project’s contribution to the cumulative impact would not be cumulatively considerable and, therefore, would be less than significant.

11.3.2 Construction

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

¹²⁰ White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix D, p. D-3.

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

The Project’s construction-related air quality emissions and cumulative impacts would be less than significant. Individual projects that generate emissions that do not exceed SCAQMD’s significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

A cumulatively considerable net increase would occur if the Project’s construction impacts substantially contribute to air quality violations when considering other projects that may undertake construction activities at the same time.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. For example, a proposed 56-unit eldercare development at 843-847 Sherbourne Drive is proposed approximately 200 feet away from the Project Site. If this or any related projects were to undertake construction concurrently with the Project, localized CO, PM_{2.5}, PM₁₀, and NO₂ concentrations would be further increased. However, the application of LST thresholds to this Project would help ensure that it does not produce localized hotspots of CO, PM_{2.5}, PM₁₀, and NO₂. The SCAQMD’s LST thresholds recognize the influence of a receptor’s proximity, setting mass emissions thresholds for PM₁₀ and PM_{2.5} that generally double with every doubling of distance

If any related projects were to undertake construction concurrently with the Project, localized CO, PM_{2.5}, PM₁₀, and NO₂ concentrations would be further increased. However, the application of LST thresholds to this project would help ensure that it does not produce localized hotspots of CO, PM_{2.5}, PM₁₀, and NO₂. This and any related projects that would exceed LST thresholds (after mitigation) could perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD’s LST thresholds recognize the influence of a receptor’s proximity, setting mass emissions thresholds for PM₁₀ and PM_{2.5} that generally double with every doubling of distance.

There is an existing regional cumulative impact associated with O₃, NO₂, PM₁₀, and PM_{2.5} because the Basin is designated as a State and/or federal nonattainment air basin for these pollutants. However, an individual Project can emit these pollutants without significantly

contributing to this cumulative impact depending on the magnitude of emissions. As discussed above, construction and operational emissions would not exceed any applicable SCAQMD thresholds of significance.

With respect to the Project's construction-related air quality emissions and cumulative Air Basin-wide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. As stated above, the Project would comply with applicable regulatory requirements, including the SCAQMD Rule 403 requirements. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Air Basin-wide would comply with these same regulatory requirements and would implement all feasible mitigation measures when significant impacts are identified.

According to the SCAQMD, individual projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown in **Table 7-7**, Project construction daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative construction-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant.

11.3.3 Operation

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

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

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. The Project would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM₁₀ and PM_{2.5} would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants. As shown in **Table 7-7**, Project operation daily emissions would not exceed any of the SCAQMD's regional or localized thresholds. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance. Therefore, the Project's contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable and, thus, would be less than significant.

11.4 Water Quality

The Project Site and any related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments are required to control the amount and quality of stormwater runoff coming from their respective sites.

Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, the cumulative water quality impact of successive projects of the same type in the same place over time would not be significant.

11.5 Public Service

11.5.1 Fire Protection

The Project, in combination with any related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-density buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance with existing regulations and LAMC, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the cumulative impact to fire protection from successive projects of the same type in the same place over time would not be significant.

11.5.2 Police Protection

The Project, in combination with any related projects, would increase the demand for police

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:37 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 12 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. Similar to the Project, the related projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance with existing regulations and LAMC, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Therefore, the cumulative impact to police protection from successive projects of the same type in the same place over time would not be significant.

11.5.3 Schools

The Project, in combination with any related projects, is expected to result in a cumulative increase in the demand for school services. However, similar to the Project, the applicants of all the related projects would be required to pay the state mandated applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, the cumulative impact to schools from successive projects of the same type in the same place over time would not be significant.

11.5.4 Parks

The Project, in combination with any related projects, could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio. However, employees generated by the commercial projects and the commercial portions of mixed-use projects on the related projects list would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. Therefore these project-generated employees would not contribute to the future demand on park and recreational facility services. The applicants of related residential projects would be subject to the City's parkland fees (e.g., Quimby Fees and/or Park and Recreation fees for non-subdivision projects) and to minimum open space requirements, ensuring that any potential impacts to parks and recreational facilities would be less than significant. Therefore, the cumulative impact to parks from successive projects of the same type in the same place over time would not be significant.

11.5.5 Other Public Facilities

Given the geographic range of any related projects, they would be served by a variety of libraries.¹²¹ Development of the related projects would likely generate additional demands upon library services. However, there are no planned expansions or new libraries by the LAPL that would be considered a significant impact. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. Therefore, the cumulative impact to libraries from successive projects of the same type in the same place over time would not be significant.

¹²¹ LAPL Locations: <http://www.lapl.org/branches>

11.6 Utilities

11.6.1 Wastewater

Implementation of the Project combined with any related projects would increase the generation for wastewater treatment. The remaining treatment capacity of the HTP (175 mgd) would accommodate the wastewater treatment requirements of the related projects. The cumulative generation would be within the remaining capacity of the HTP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required to serve the Project, and it is unlikely that any subsequent projects would significantly impact remaining capacity. Therefore, the cumulative wastewater impact from successive projects of the same type in the same place over time would not be significant.

11.6.2 Water

Implementation of the Project combined with any related projects would result in a net increase in water consumption within LADWP's service area. Similar to the Project, the water supply needs of those related projects that are consistent with the City's General Plan have been accounted for in the 2020 UWMP.¹²² However, the applicants of all projects within LADWP's service area would be required to consult with LADWP to determine the specific water supply needs of each respective project, appropriate water conservation measures to minimize water usage, and LADWP's ability to serve each related project. Larger developments (e.g., residential projects with 500 or more units) would also be required to prepare and obtain approval of a Water Supply Assessment from LADWP. In addition, the Project would create the need for a fraction of one percent of the remaining capacity of the LAAFP, and would not result in any significant impacts related to water treatment. No new or upgraded treatment facilities would be required to serve the Project, and it is unlikely that any subsequent projects would significantly impact remaining capacity. As such, the cumulative water impact of successive projects of the same type in the same place over time would not be significant.

11.6.3 Solid Waste

Implementation of the Project combined with any related projects would increase the need for landfill capacity. All development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated and the need for landfill capacity. As discussed previously, the landfills serving the Project area have more than adequate capacity to accommodate the Project. Therefore, cumulative solid waste impact from successive projects of the same type in the same place over time would not be significant.

The Project's contribution to cumulative wastewater, water, and solid waste impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

¹²² LADWP, UWMP, 2020, page II-20: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmpln;jsessionid=0LnWhxdVj2Jjg2Vm6Xrr4rmqyLL9GtlpLdJBQxVQgdb53TnwhJRB!-1106340359?_afLoop=151440072116797&_afWindowMode=0&_afWindowId=null#%40%3F_afWindowId%3Dnull%26_afLoop%3D151440072116797%26_afWindowMode%3D0%26_adf.ctrl-state%3Dw319ymek_4

12 Guideline 15300.2. Exceptions: (c) Significant Effect.

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

12.1 Introduction

The Project would not have a significant effect on the environment and there are no unusual circumstances associated with the Project, the Project Site, or the vicinity. The Project Site and vicinity are highly urbanized, developed, and flat. There are no unusual circumstances related to the development of the Project's uses at this location. The Project will be required to comply with all applicable regulatory measures.

12.2 Unusual Circumstances

The Project proposes an infill development that is consistent with the existing zoning, General Plan land use designation, and all provisions and regulations of the Community Plan.

The Project Site is not located in a designated significant ecological area¹²³ or other overlay that would denote special circumstances.

12.3 Methane

The Site is within a Methane Zone.¹²⁴ The Project will comply with the regulatory measures that are typically required by LADBS for projects in a Methane Zone.¹²⁵

In March 2004, Ordinance Number 175790 was adopted into the LAMC (Section 91.106.4.1 and Division 71, Chapter IX) to establish city-wide methane regulatory requirements, and included updated construction standards to control methane intrusion into buildings. This ordinance established defined geographic areas as Methane Zones and Methane Buffer Zones, which relate to specific assessment and mitigation requirements per area and set forth a standard of assessment and mitigation in the planning stages of all new construction in these areas.

The LADBS Methane Standard Plan provides a guide in the development of a site-specific plan. The Site will fall into one of five methane mitigation design levels identified as Levels I through V. As on-Site methane concentrations increase, so do the requirements needed to mitigate the methane intrusion. There is a direct relationship between project zoning, test results, and the final design. Once the methane level is determined, the methane mitigation requirements can be implemented into the building design, under the permit and approval of LABDS and LAFD.

¹²³ NavigateLA, Special Areas layer: <https://navigatea.lacity.org/navigatea/>

¹²⁴ <http://zimas.lacity.org>, accessed October 22, 2021.

¹²⁵ <https://www.ladbs.org/services/core-services/plan-check-permit/methane-mitigation-standards>

12.4 Oil and Gas Fields

The Site is not within the limits of the Beverly Hills oil field, which begins 70 feet south of the Site.¹²⁶

According to a review of the California Department of Geological Energy Management (CalGEM) map, the nearest oil well is identified as API 0403715159 and located at the intersection of Sweetzer Avenue and San Vicente Boulevard, approximately 3,000 feet northeast.¹²⁷

12.5 Geotechnical Considerations

According to the California Department of Conservation, the Project Site is:¹²⁸

- not located within an earthquake fault zone
- is within a liquefaction zone
- not within a landslide zone

Further, the State of California Seismic Hazard Zone Map indicates that the site is located within an area identified as having a potential for liquefaction. Also, according to the Los Angeles Safety Element, the Site is located within an area identified as having a potential for liquefaction.

The Project will be completed in accordance with the provisions of the most current applicable building code and requirements of the LADBS including the preparation of a soils and geology report, which will be reviewed by LADBS.

12.6 Conclusion

Therefore, there are no unusual circumstances that may result in any significant environmental effects, and this exception does not apply to the Project.

¹²⁶ Geotechnical, Oil/Gas Fields layer, <https://navigatela.lacity.org/navigatela/>, accessed October 22, 2021.

¹²⁷ California Department of Conservation Wellfinder map: <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.35524/34.02773/14>, accessed October 22, 2021.

¹²⁸ California Department of Conservation: <https://maps.conservation.ca.gov/cgs/EQZApp/>, accessed October 22, 2021.

13 Guideline 15300.2. Exceptions: (d) Scenic Highways.

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

The Project Site is not located within or along a designated scenic highway, corridor, or parkway.¹²⁹

The closest officially designated state scenic highways are approximately 12 miles west of the Project Site (State Route 27, Topanga Canyon from SR 1 to Mulholland) and 15.35 miles northeast of the Project Site (State Route 2, from 3 miles north of I-210 in La Canada to the San Bernardino County Line).¹³⁰

The nearest historic parkway is the Arroyo Seco Historic Parkway (I-110) between milepost 25.7 and 31.9, and is approximately 8.25 northeast of the Project Site.¹³¹

There are no designated scenic highways in the area around the Project Site.¹³²

Therefore, the Project would not damage a scenic resource within a scenic highway, and this exception does not apply to the Project.

¹²⁹ California Scenic Highway Mapping Systems: <http://www.dot.ca.gov/hq/LandArch/scenichighways/index.htm>

¹³⁰ Caltrans State Scenic Highways: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> and GIS Map: <https://www.arcgis.com/home/item.html?id=f0259b1ad0fe4093a5604c9b838a486a>, accessed October 22, 2021.

¹³¹ Arroyo Seco Parkway: https://www.nps.gov/nr/travel/route66/arroyo_seco_parkway.html, accessed October 22, 2021.

¹³² Mobility Element 2035: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf

14 Guideline 15300.2. Exceptions: (e) Hazardous Waste Sites.

A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to section 65962.5 of the government code.

14.1 Cortese List

In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency.

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on the Project Site.¹³³

According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST (Underground Storage Tanks) facilities, monitoring wells, or California Department of Toxic Substance Control (DTSC) cleanup sites or hazardous materials permits on the Project Site.¹³⁴

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.¹³⁵

There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.¹³⁶

The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.¹³⁷

14.2 Site History

According to the City, a Phase I Environmental Site Assessment (ESA) may be required if the project site was previously developed with a dry cleaning, auto repair, gasoline station,

¹³³ California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>.

¹³⁴ California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>.

¹³⁵ California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>

¹³⁶ California Environmental Protection Agency, Cortese List Data Resources, List of “Active” CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>.

¹³⁷ California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>

industrial/manufacturing use, or other similar type of use that may have resulted in site contamination.¹³⁸

According to the City's building permits, the existing onsite residential buildings were built in 1931.¹³⁹ They continue to function as residential buildings to the present. Thus, there has not been a use that may have resulted in site contamination.

14.3 Conclusion

Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, this exemption does not apply to the Project.

¹³⁸ City of Los Angeles, Class 32 Special Requirement Criteria: <https://planning.lacity.org/odocument/ad70d15e-11b8-49ef-aba3-b168f670a576/Class%2032%20Categorical%20Exemption.pdf>

¹³⁹ LADBS Building Permits: <https://ladsdoc.lacity.org/>

15 Guideline 15300.2. Exceptions: (f) Historical Resources.

A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

This section is based on the following items, which are included as **Appendix F** to this CE:

F Historical Resources Assessment Report, Historic Resources Group, June 2020.

Based on an observation of existing conditions, research related to the history of the property, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument, the buildings do not appear eligible for listing at the federal, state, or local levels.

They are not significant for an association with important events/patterns of development; they are not associated with an important person; and they do not meet the eligibility requirements for designation as excellent examples of an architectural style or type, or as the work of a master architect. Therefore, the buildings do not warrant further consideration or additional analysis as historical resources as defined by CEQA.¹⁴⁰

Therefore, this exception does not apply to the Project.

¹⁴⁰ Historical Resources Assessment Report, Historic Resources Group, June 2020.

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:40 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 13 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)



Sheet Index

Architectural:

A0.0	Cover Sheet
A0.1	Vicinity Map
A1.0	Site Plan
A1.1	Sun/ Shade Exhibit
A1.2	Holt Ave. Setback Exhibit
A2.0	Building Elevations
A3.0	Building Plans
A3.1	Building Plans
A4.0	Building Sections
A5.0	Unit Plans
A5.1	Unit Plans
A6.0	Perspectives
A6.1	Perspectives



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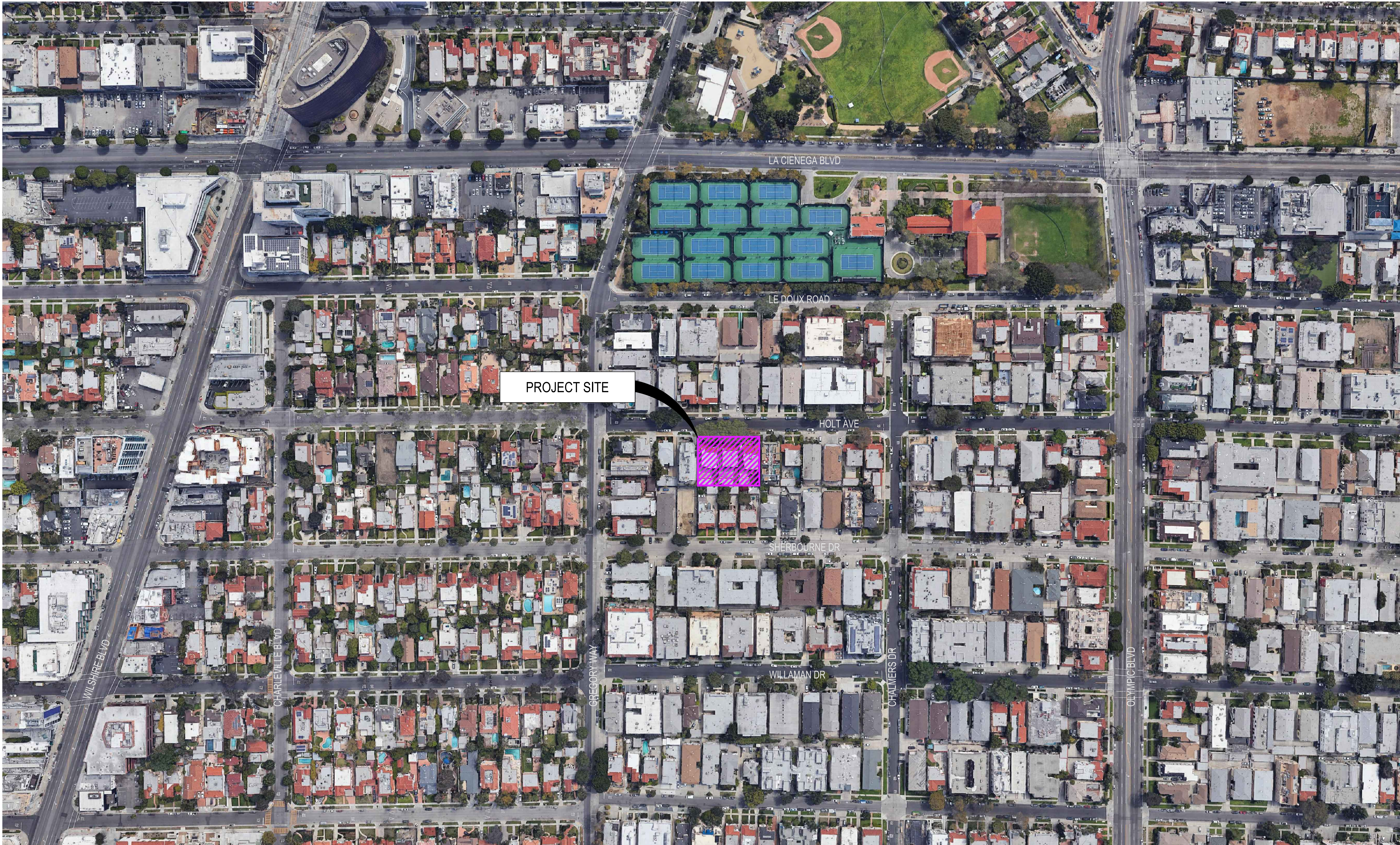
The Panorama Group, Inc.
9171 Wilshire Boulevard, Suite 500
Beverly Hills, CA 90210

HOLT AVE AL MC
LOS ANGELES, CA # 2020-0010

CONCEPT PHASE
AUGUST 10, 2021

COVER SHEET
SHEET INDEX

A0.0



Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:40 AM

Council File No: 21-0593-S1

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PROJECT DATA

SITE SUMMARY:		
APN: 4333-024-008	ADDRESS: 825-827 Holt Avenue	ZONING [QJR3-1-O Multiple Dwelling
APN: 4333-024-009	ADDRESS: 829-831 Holt Avenue	ZONING [QJR3-1-O Multiple Dwelling
APN: 4333-024-010	ADDRESS: 835-837 Holt Avenue	ZONING [QJR3-1-O Multiple Dwelling
SITE AREA	18,003 SF	
	0.41 AC	
BUILDABLE AREA	11,390 SF	
ALLOWED DENSITY	36 Guest Rooms	
PROPOSED DENSITY	80 Guest Rooms	
	225 SF/Guest Room	
BUILDING EFFICIENCY	55%	
FAR (Basement + B1- L5)	4.99	
FAR (B1- L5)	4.24	
LOT COVERAGE	12,840 SF	
ALLOWABLE HEIGHT	45 FT	
PROPOSED HEIGHT	58 FT	
REQUIRED OPEN SPACE	N/A	

OPEN SPACE SUMMARY

LEVEL B1 COURTYARD	1,140 SF
LEVEL 1 DINING COURTYARD	1,160 SF
NORTH REAR COURTYARD	580 SF
SOUTH REAR COURTYARD	900 SF
LEVEL 2 MC OPEN PATIO	300 SF
LEVEL 5 PATIO 1	500 SF
LEVEL 5 PATIO 2	500 SF
LEVEL 5 PATIO 3	1,400 SF
LEVEL 5 PATIO 4	140 SF
TOTAL	6,620 SF

SETBACK SUMMARY (LAMC 12.10.C)

	REQUIRED	PROVIDED
FRONT	20 FT	10 FT
NORTH SIDE	8 FT	6 FT
SOUTH SIDE	8 FT	6 FT
REAR	15 FT	15 FT

BUILDING SUMMARY:

BUILDING AREAS	TOTAL	PROGRAM	TOTAL	
B1	8,544	MEMORY CARE ROOMS	6,216	10.9%
L1	8,830	MEMORY CARE COMMON SPACE	4,023	7.1%
L2	10,239	ASSISTED LIVING ROOMS	24,780	43.6%
L3	10,638	ASSISTED LIVING COMMON SPACE	21,777	38.3%
L4	10,638			
L5	7,907			
TOTAL SF	56,796	TOTAL SF	56,796	

ROOM MIX	Gsf	BEDS	L1	L2	L3	L4	L5	GUEST ROOMS	TOTAL BEDS	TOTAL GSF
MC P0	348	1	0	2	0	0	0	2	2	696
MC P0.1	329	1	0	12	0	0	0	12	12	3,948
MC P2	393	2	0	4	0	0	0	4	8	1,572
MC TOTAL			0	18	0	0	0	18	22	6,216
										20.1% OF TOTAL GUEST ROOM AREA

AL P0	349	1	0	0	3	3	2	8	8	2,792
AL P0.1	329	1	9	0	8	8	11	36	36	11,844
AL P1	433	1	1	0	3	3	1	8	8	3,464
AL P1.1	668	1	0	0	5	5	0	10	20	6,680
AL TOTAL			10	0	19	19	14	62	72	24,780
										79.9% OF TOTAL GUEST ROOM AREA

TOTAL	10	18	19	19	14	80	94	30,996
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PARKING SUMMARY:

REQUIRED	RATIO	QUANTITY	TOTAL
MEMORY CARE	0.2 SPACES/ BED	22	5 SPACES
ASSISTED LIVING	0.5 SPACES/ UNIT	62	31 SPACES
TOTAL			36 SPACES

PROVIDED SUBTERRANEAN GARAGE 36 SPACES

BIKE PARKING SUMMARY:

REQUIRED	Short-term	Long-term	TOTAL
			6 SPACES
			12 SPACES
PROVIDED	Short-term		6 SPACES
	Long-term		0 SPACES

LEVEL B1

Units	-	SF
Corridor	100	SF
Common Areas		
Lobby	640	SF
Bike Storage	332	SF
Theater	835	SF
Storage	164	SF
Shared Living / Library	813	SF
Wine Cellar	103	SF
Salon	385	SF
Staff Lounge	209	SF
Mother's Room	108	SF
AL Coordinator	97	SF
Associate Executive Director	110	SF
Sales	110	SF
Residential Laundry	121	SF
Maintenance / Caregiver Laundry	314	SF
BOM Office	102	SF
Women's	136	SF
Men's	145	SF
Fitness / Physical Therapy	1,493	SF
Fitness Storage	203	SF
Activites / Open Lounge	2,024	SF
TOTAL	8,544	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

LEVEL 1

Units	3,394	SF
Corridor	860	SF
Common Areas		
Lobby / Reception	1,007	SF
Bistro	668	SF
Main Dining	795	SF
Kitchen	1,075	SF
Food Director	100	SF
Chef Offices	100	SF
Mail / Parcels	198	SF
Executive Director	93	SF
Marketing	124	SF
Discovery	84	SF
Women's	146	SF
Men's	144	SF
Storage	42	SF
TOTAL	8,830	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

LEVEL 2

Units	6,216	SF
Corridor	2,000	SF
Common Areas		
Lobby	228	SF
Restroom	102	SF
Storage	36	SF
Wellness Office	122	SF
Serve	74	SF
Kitchen	136	SF
MC Dining	487	SF
MC Living Room	472	SF
MC Activities	304	SF
Quiet Room	62	SF
TOTAL	10,239	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

LEVEL 3

Units	8,318	SF
Corridor	1,865	SF
Common Areas		
Lobby	228	SF
Restroom	75	SF
Storage	38	SF
Janitor	22	SF
Wellness Room	50	SF
Storage	42	SF
TOTAL	10,638	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

LEVEL 4

Units	8,318	SF
Corridor	1,865	SF
Common Areas		
Lobby	228	SF
Restroom	75	SF
Storage	38	SF
Janitor	22	SF
Wellness Room	50	SF
Storage	42	SF
TOTAL	10,638	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

LEVEL 5

Units	4,750	SF
Corridor	1,701	SF
Common Areas		
Lobby	228	SF
Restroom	75	SF
Janitor	22	SF
Storage	50	SF
Serve	74	SF
Kitchen	136	SF
AL Dining	666	SF
Lounge	205	SF
TOTAL	7,907	SF
Vertical Circulation		
Stair 1	146	SF
Stair 2	146	SF
Elevators	136	SF

TOTAL	56,796	SF
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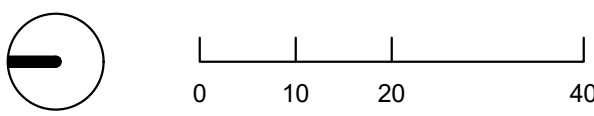
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LOS ANGELES, CA # 2020-0010

CONCEPT PHASE
AUGUST 10, 2021



SITE PLAN

A1.0



Summer Solstice (June 20th) - 9:00am



Summer Solstice (June 20th) - 12:00pm



Summer Solstice (June 20th) - 3:00pm



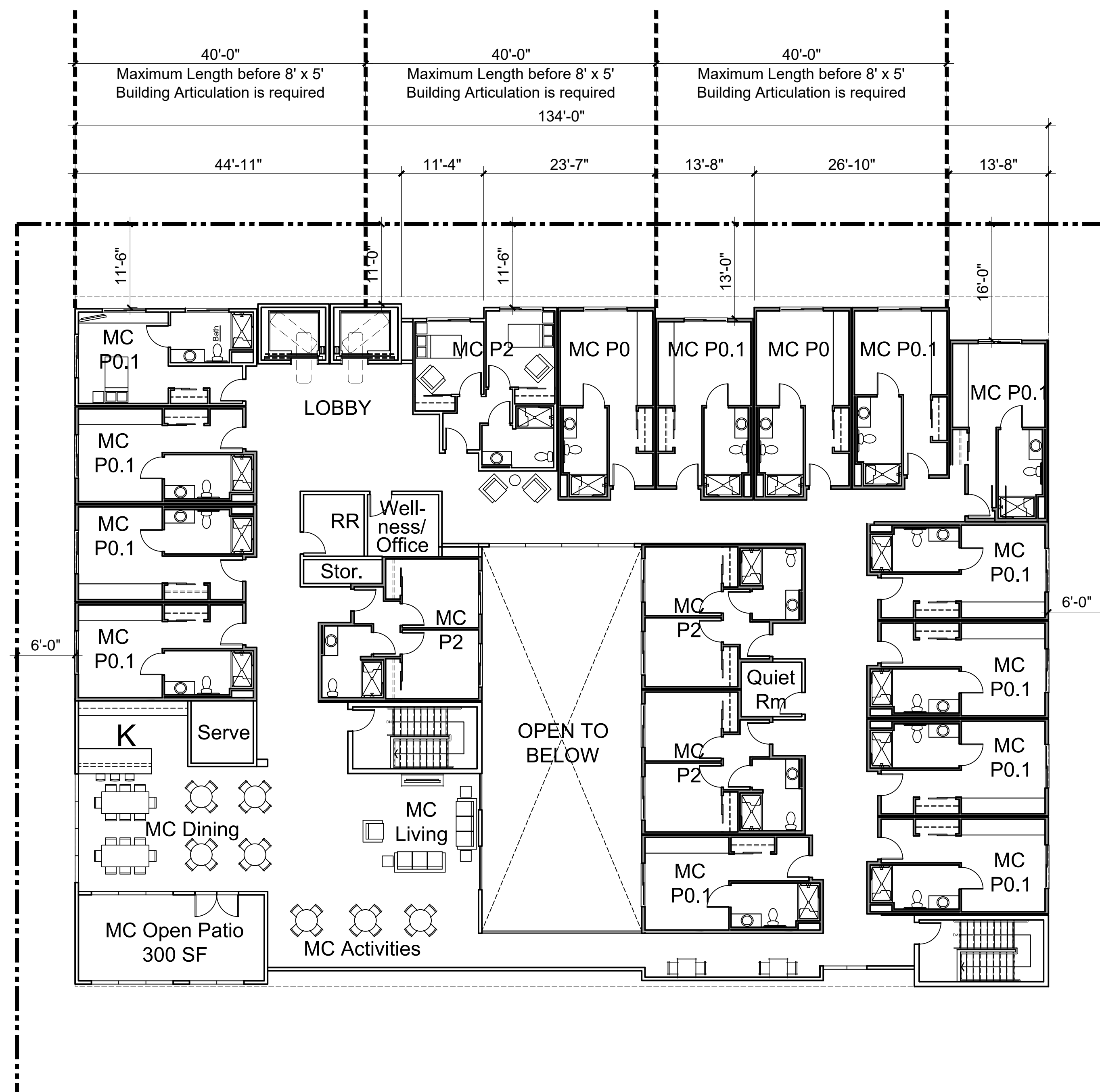
Winter Solstice (December 21st) - 9:00am



Winter Solstice (December 21st) - 12:00pm



Winter Solstice (December 21st) - 3:00pm



LEVEL 2 (TYPICAL LEVEL)



LEVEL 1

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:41 AM

Council File No: 21-0593-S1

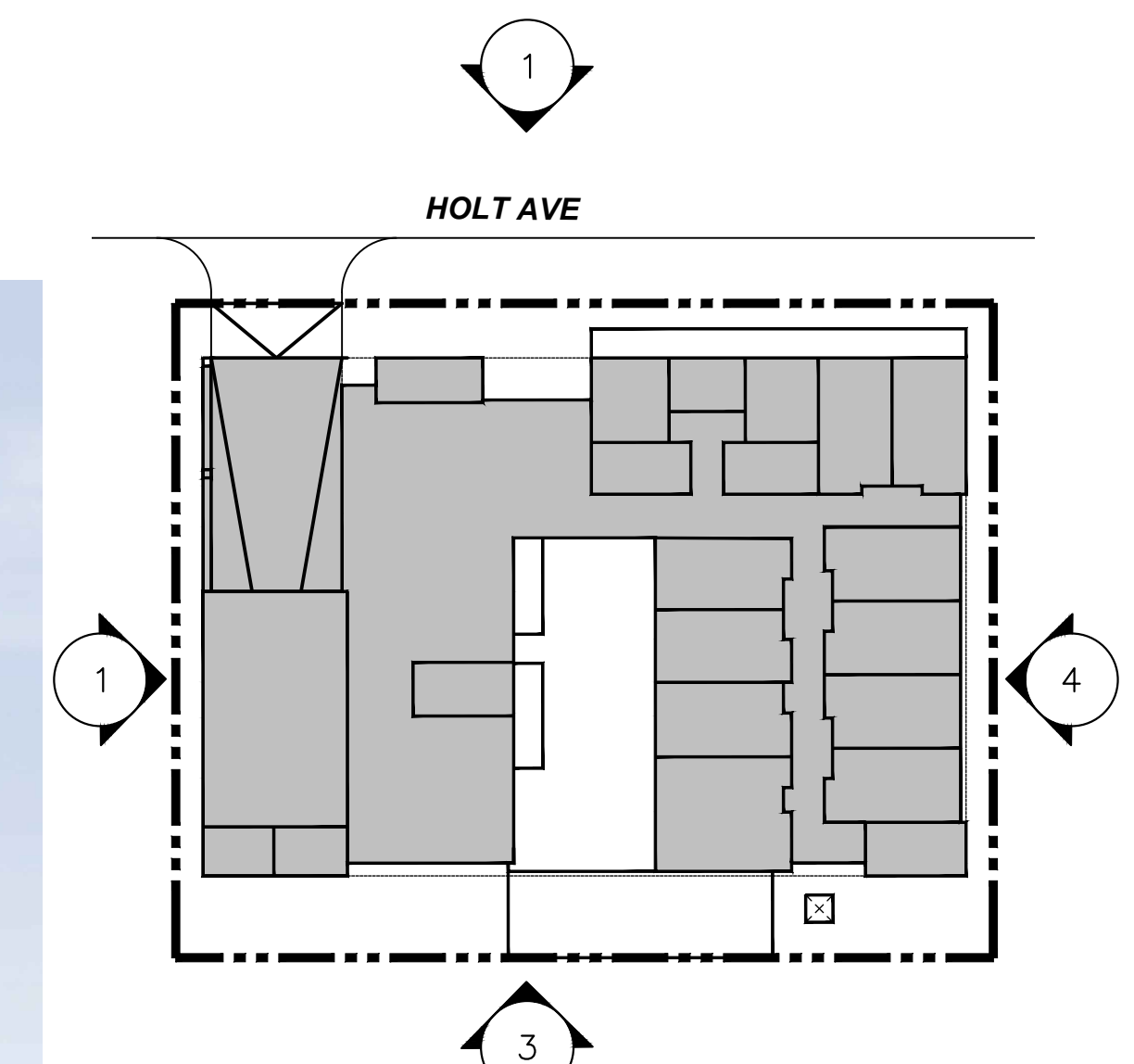
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3. REAR - West Elevation



4. LEFT - South Elevation



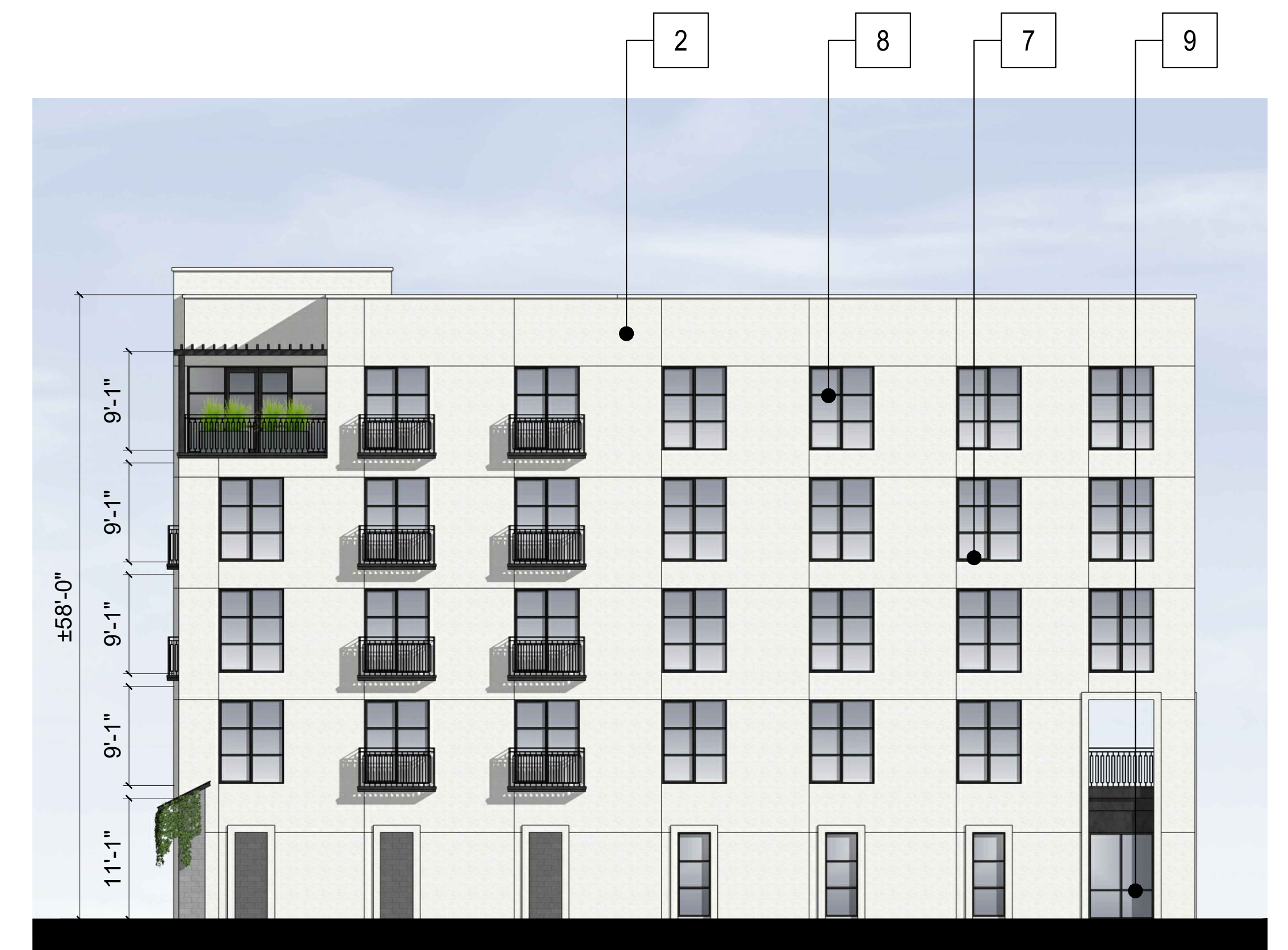
Keymap - n.t.s.

Material Legend

1. Standing Seam Metal Roof
2. Stucco
3. Fiber Cement Panel
4. Stone Veneer
5. Decorative Tile
6. Metal Ornamentation
7. Metal Railing
8. Vinyl Window
9. Storefront Glazing
10. Wall Mounted Light Sconce



1. FRONT - East Elevation



2. RIGHT - North Elevation



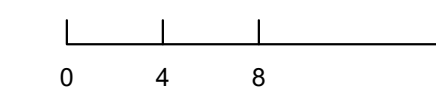
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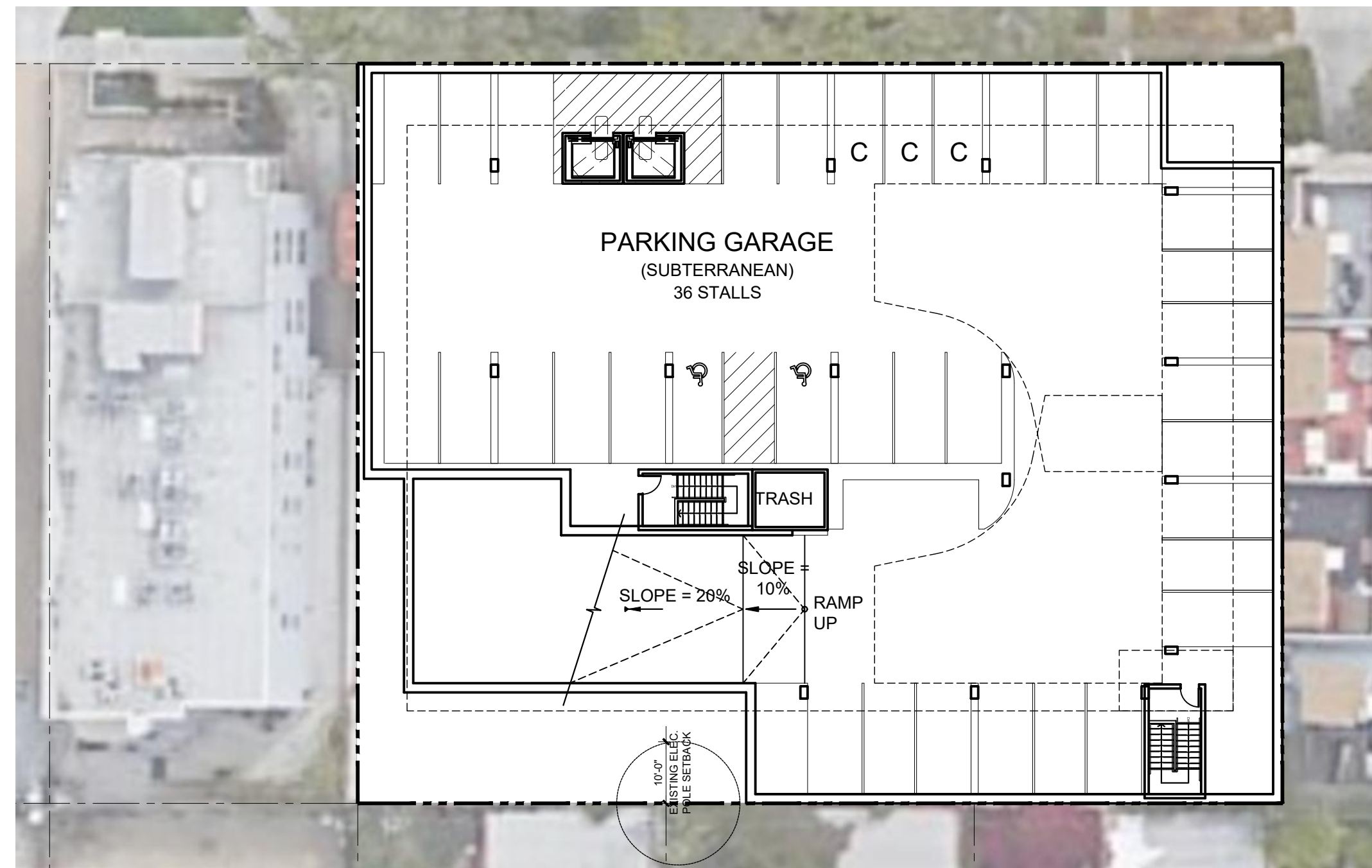
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AUGUST 10, 2021

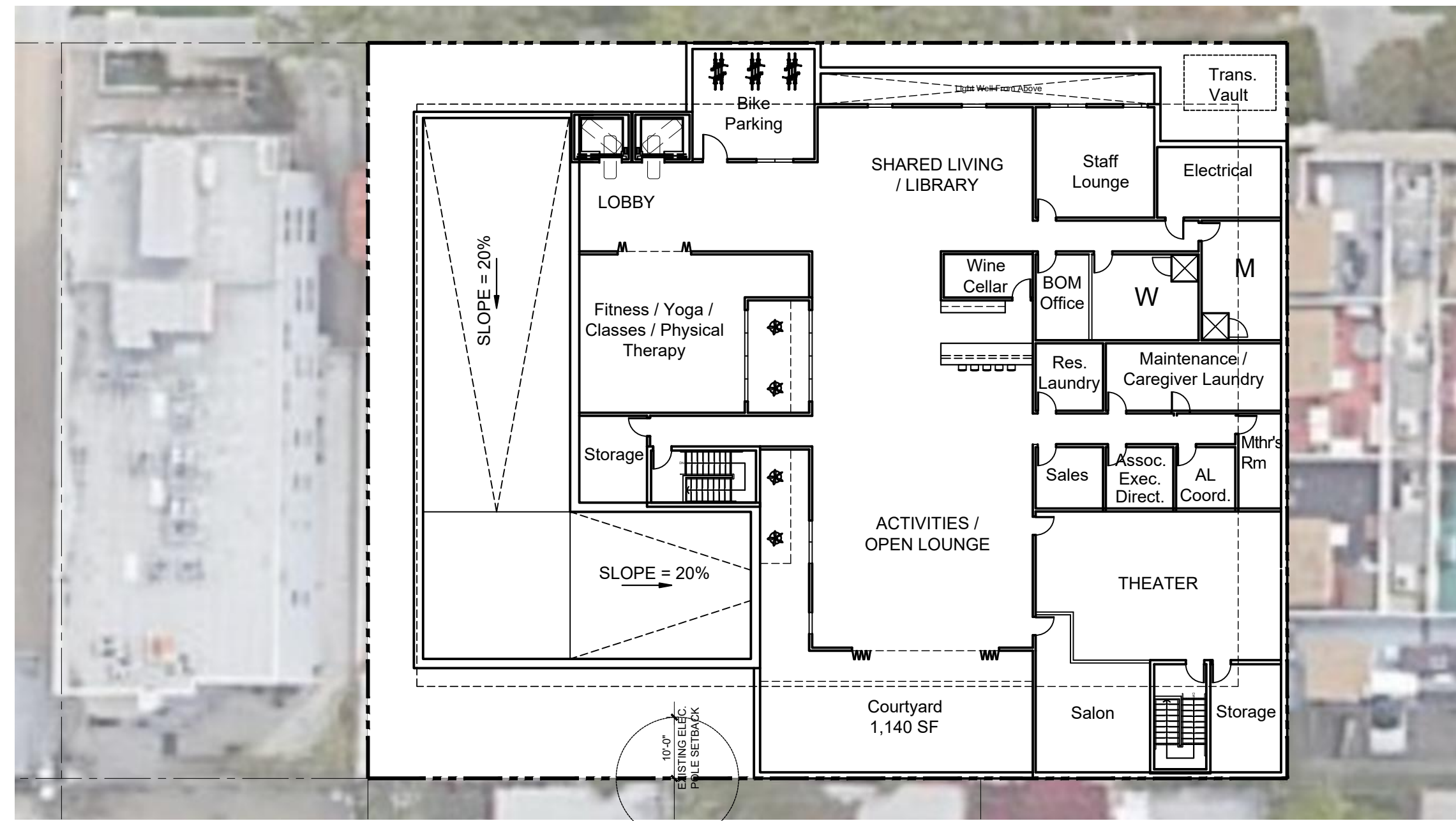


ELEVATIONS

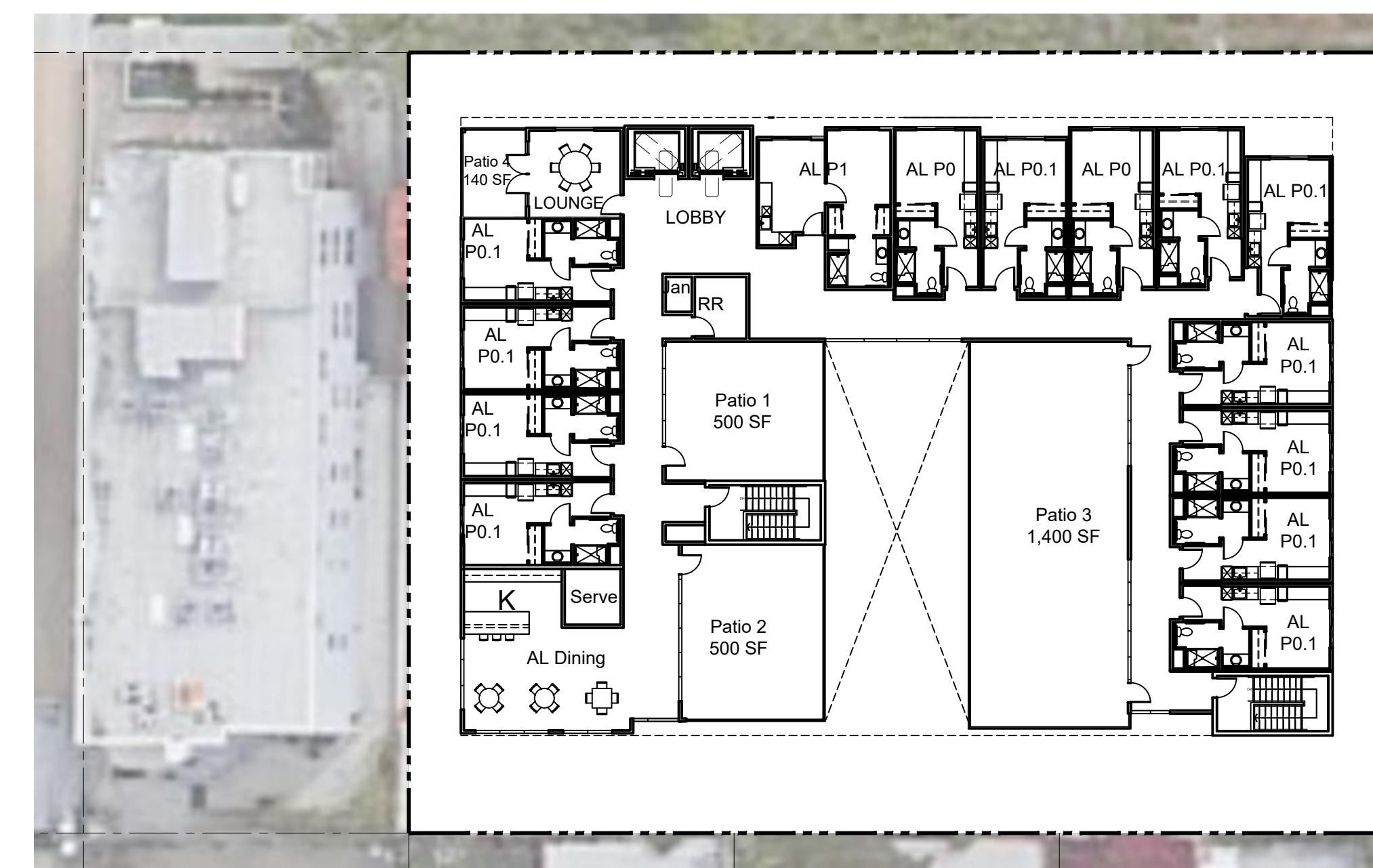
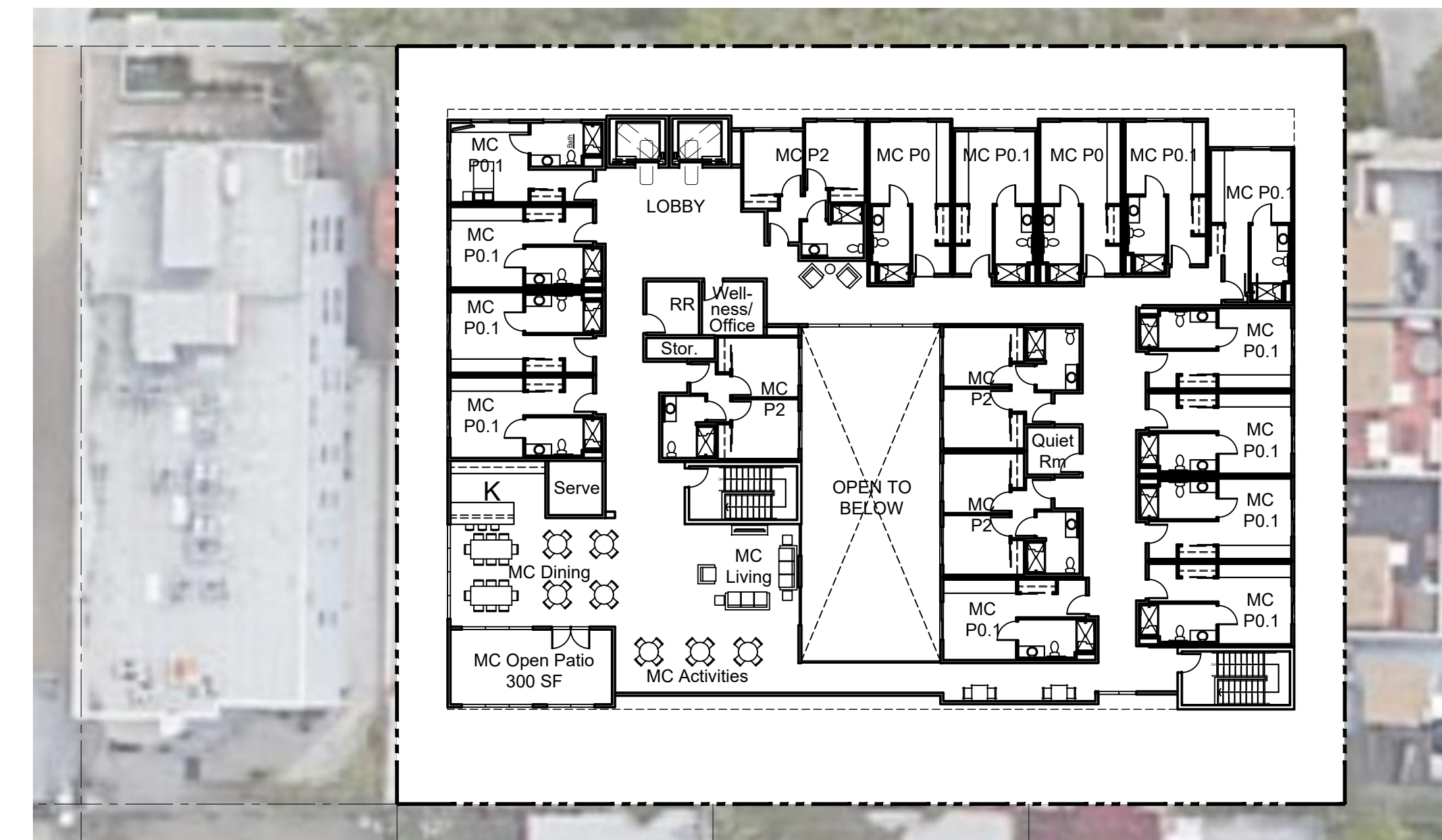
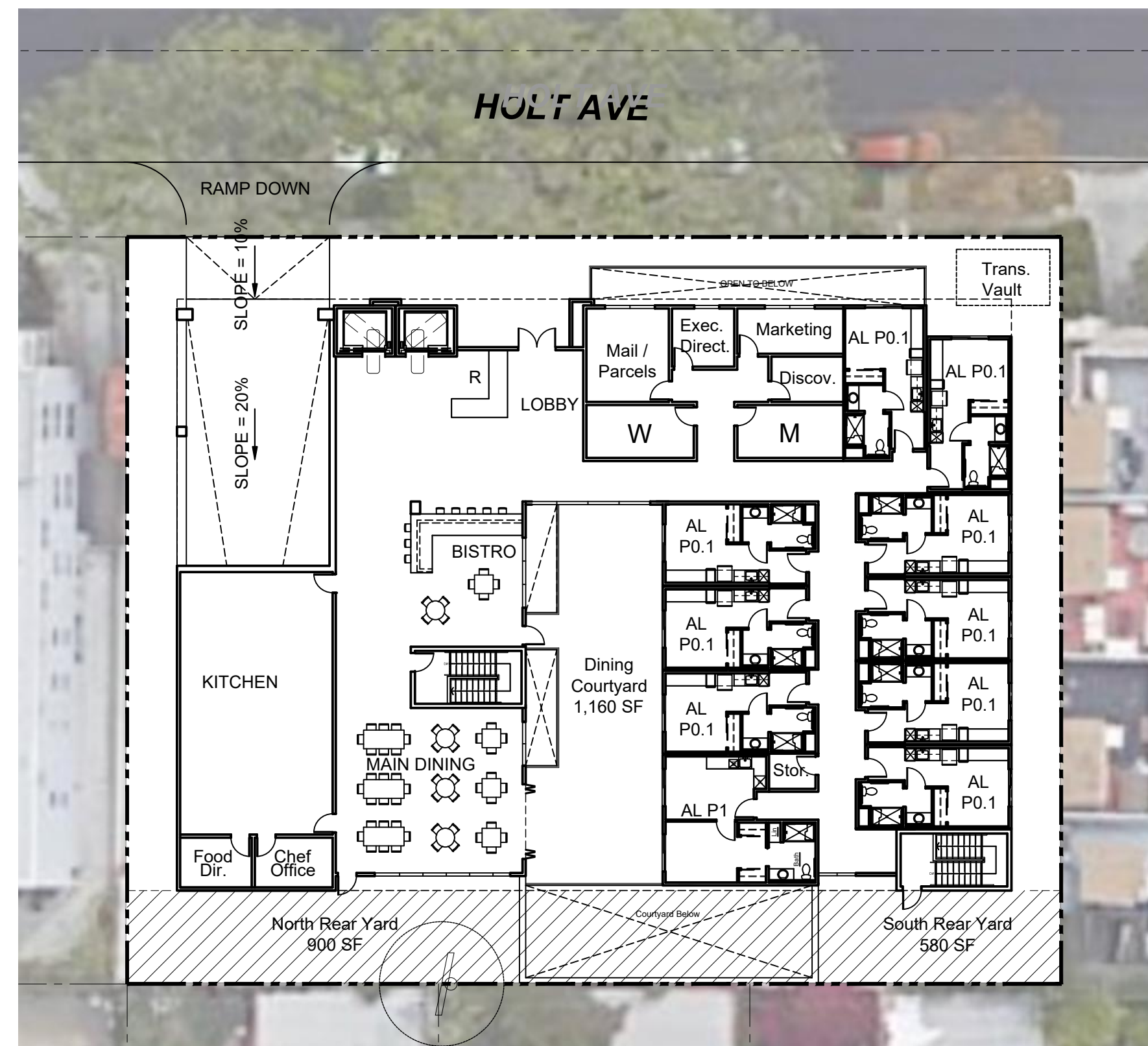
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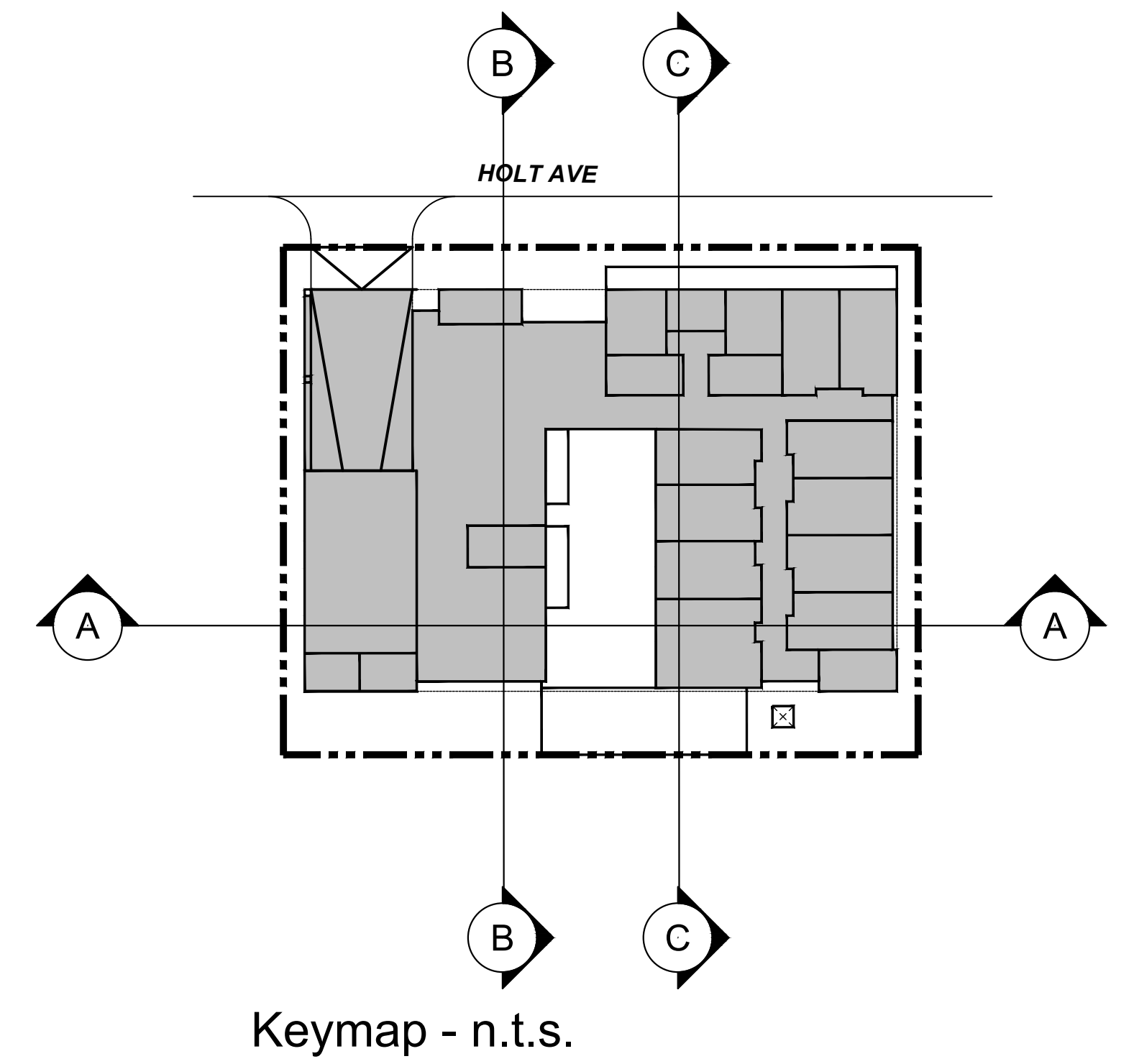
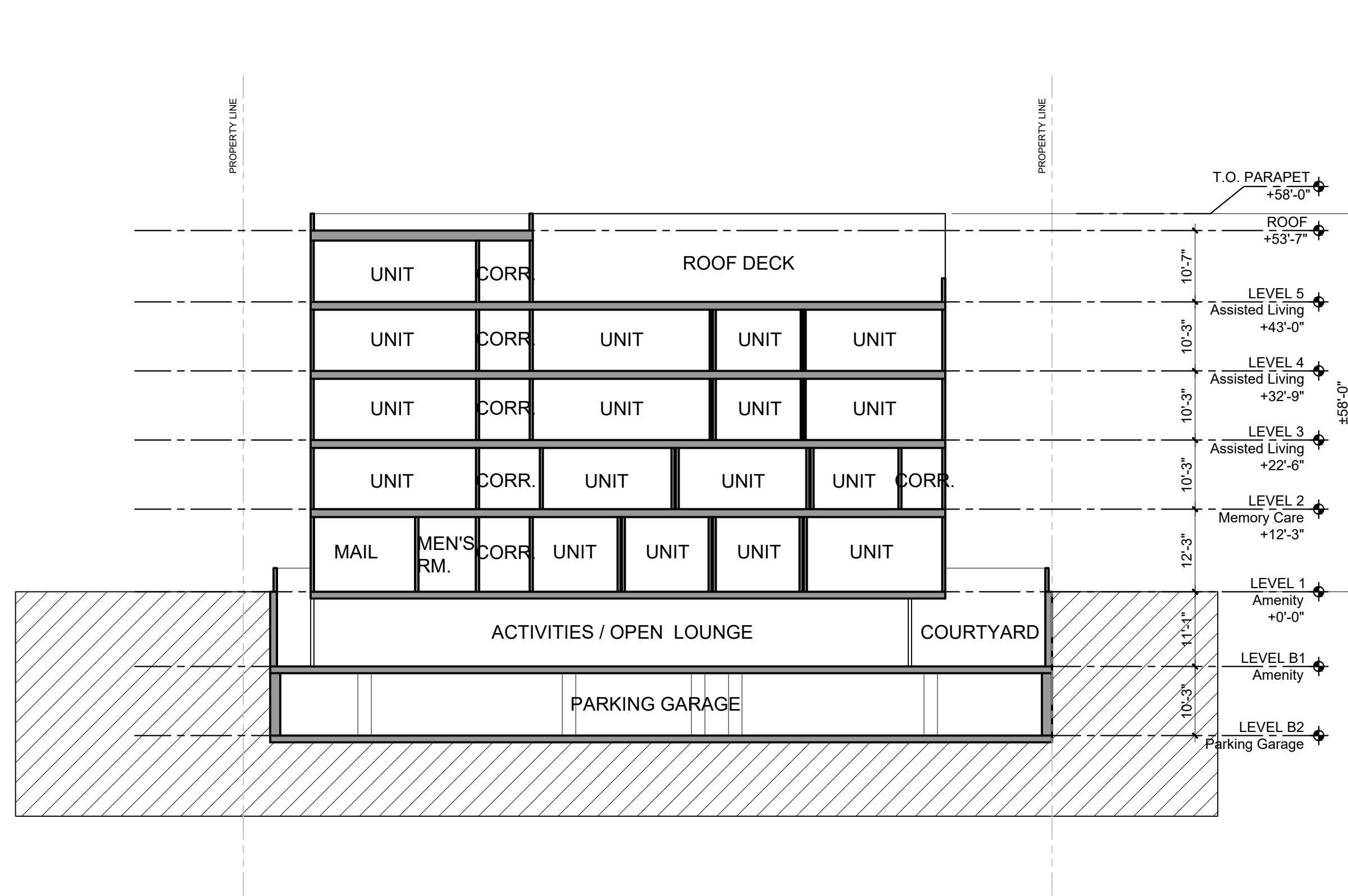


LEVEL B2

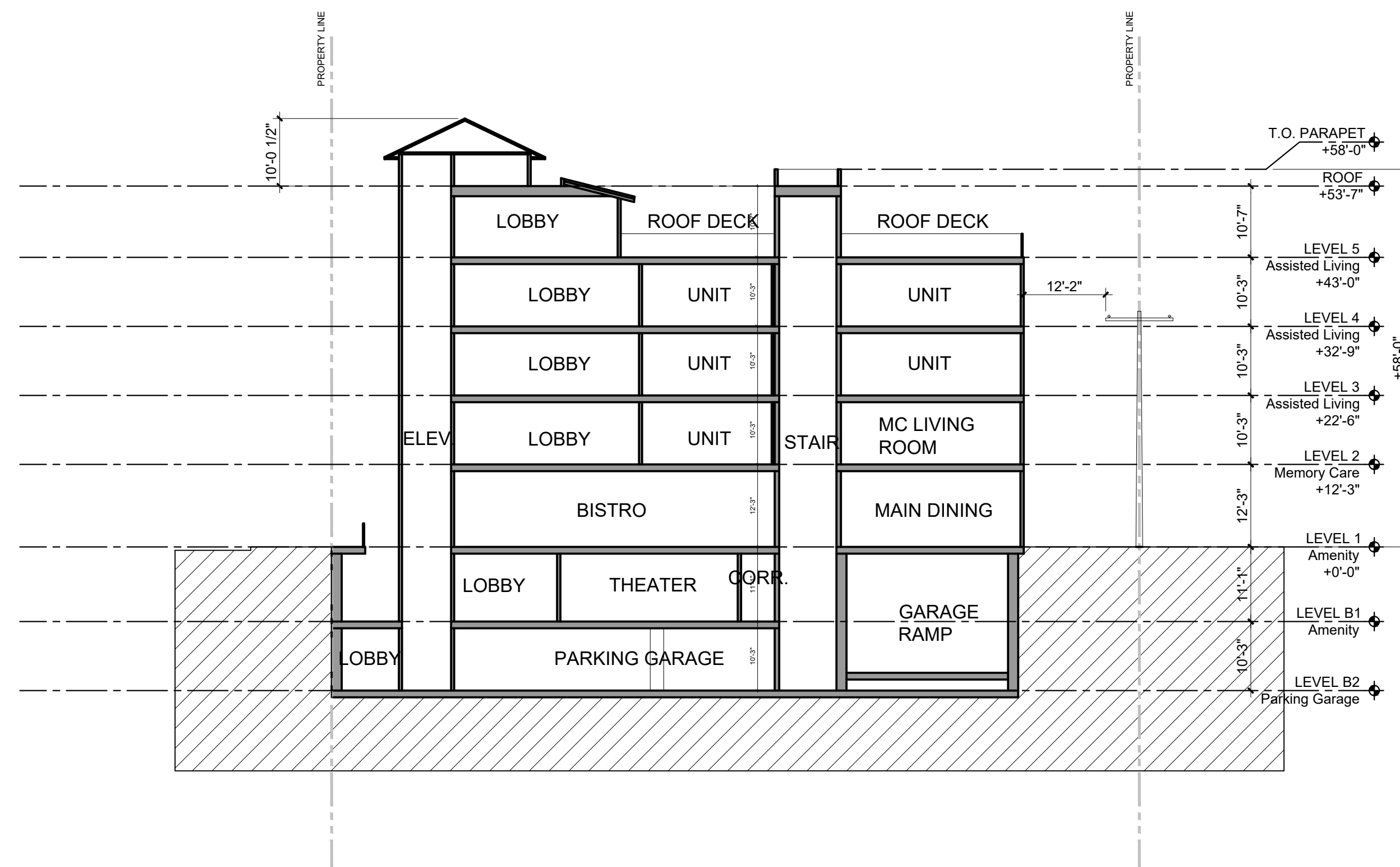


LEVEL B1

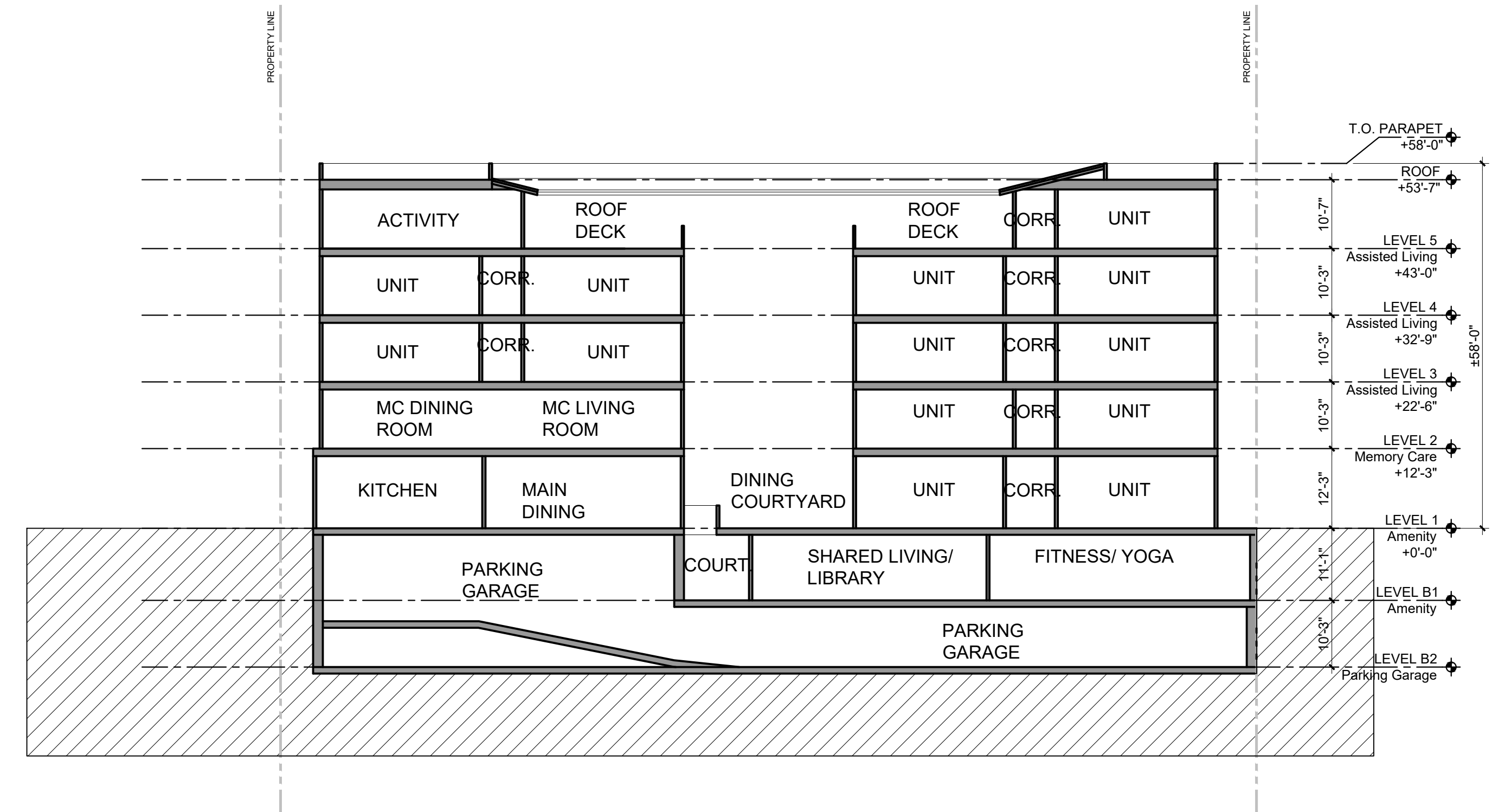




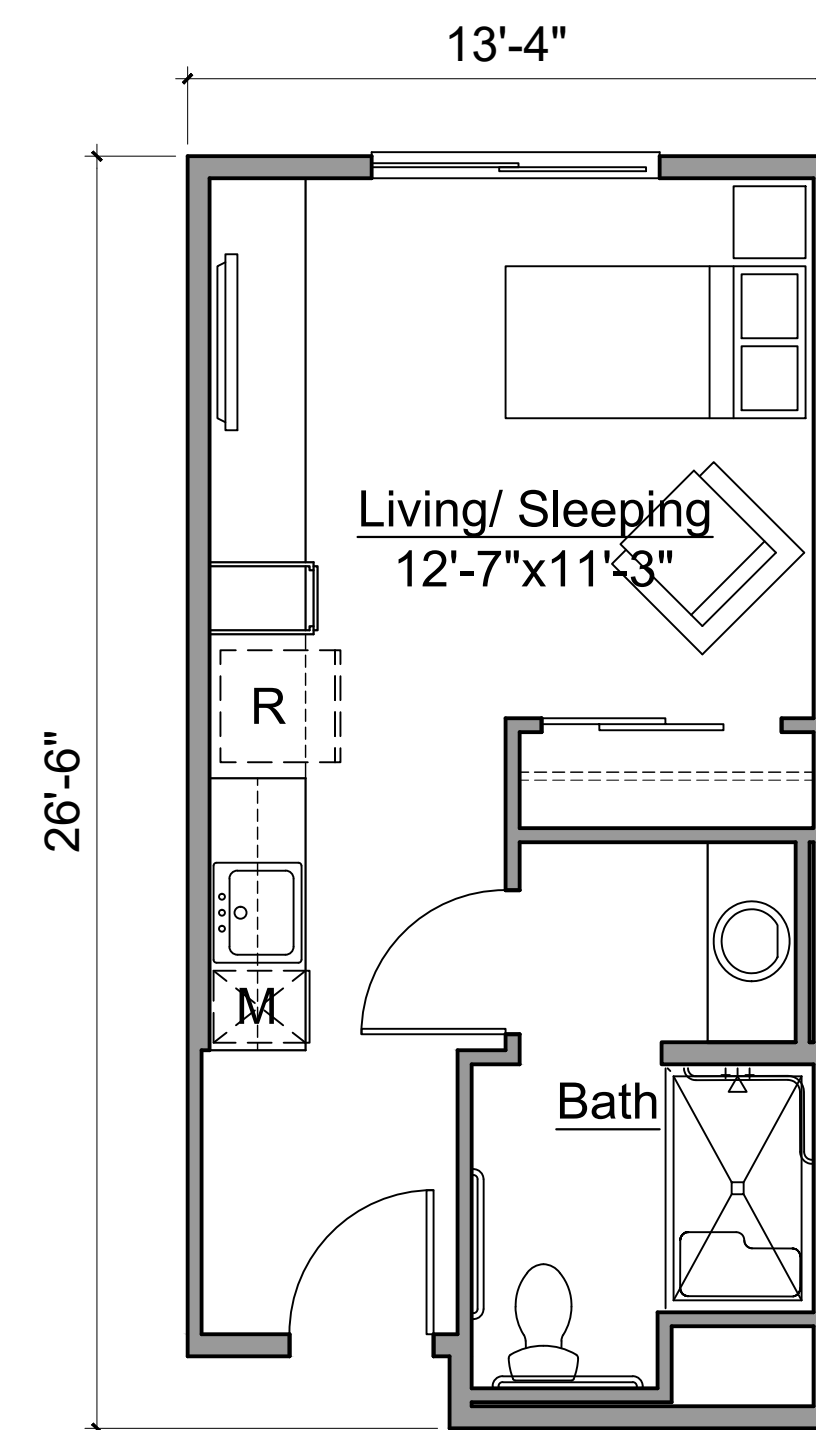
SECTION C-C



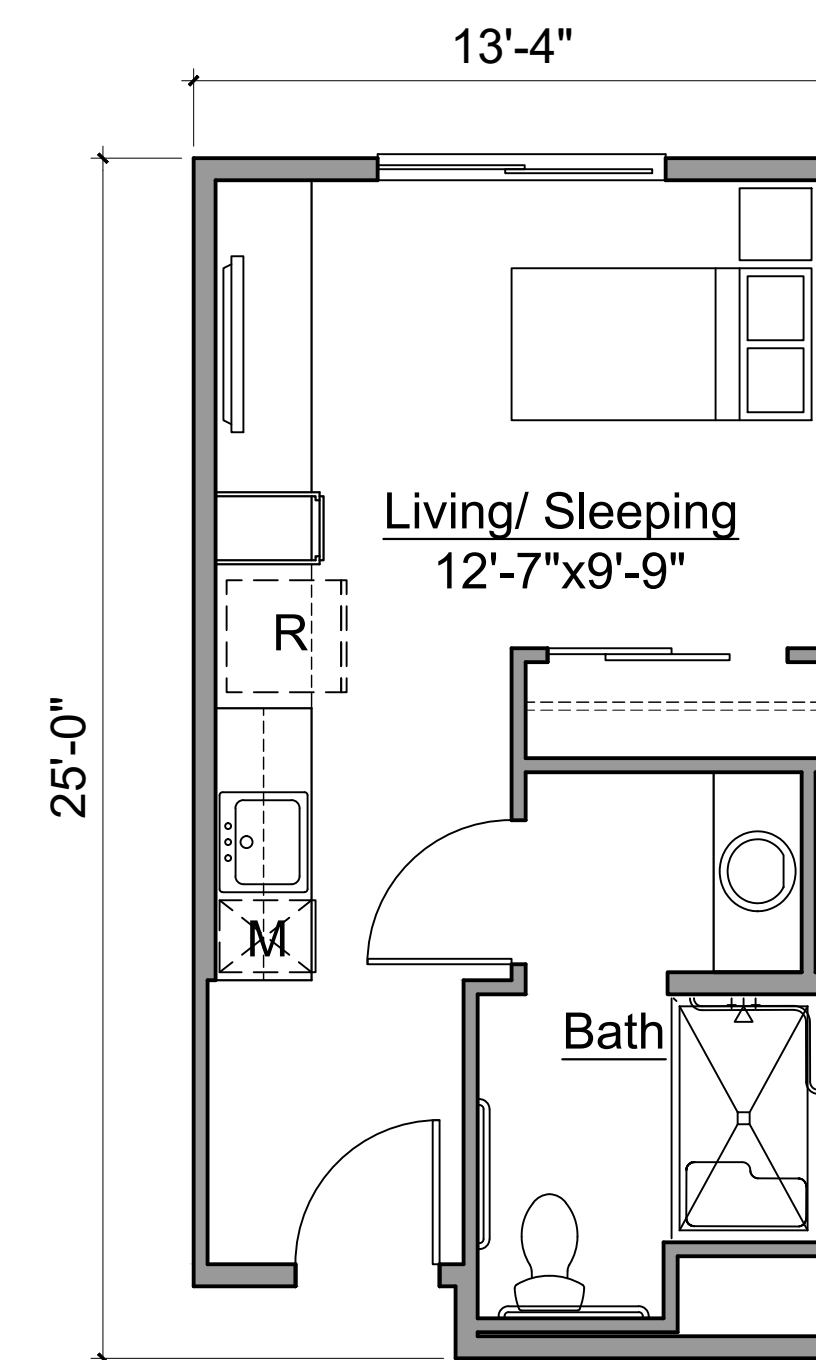
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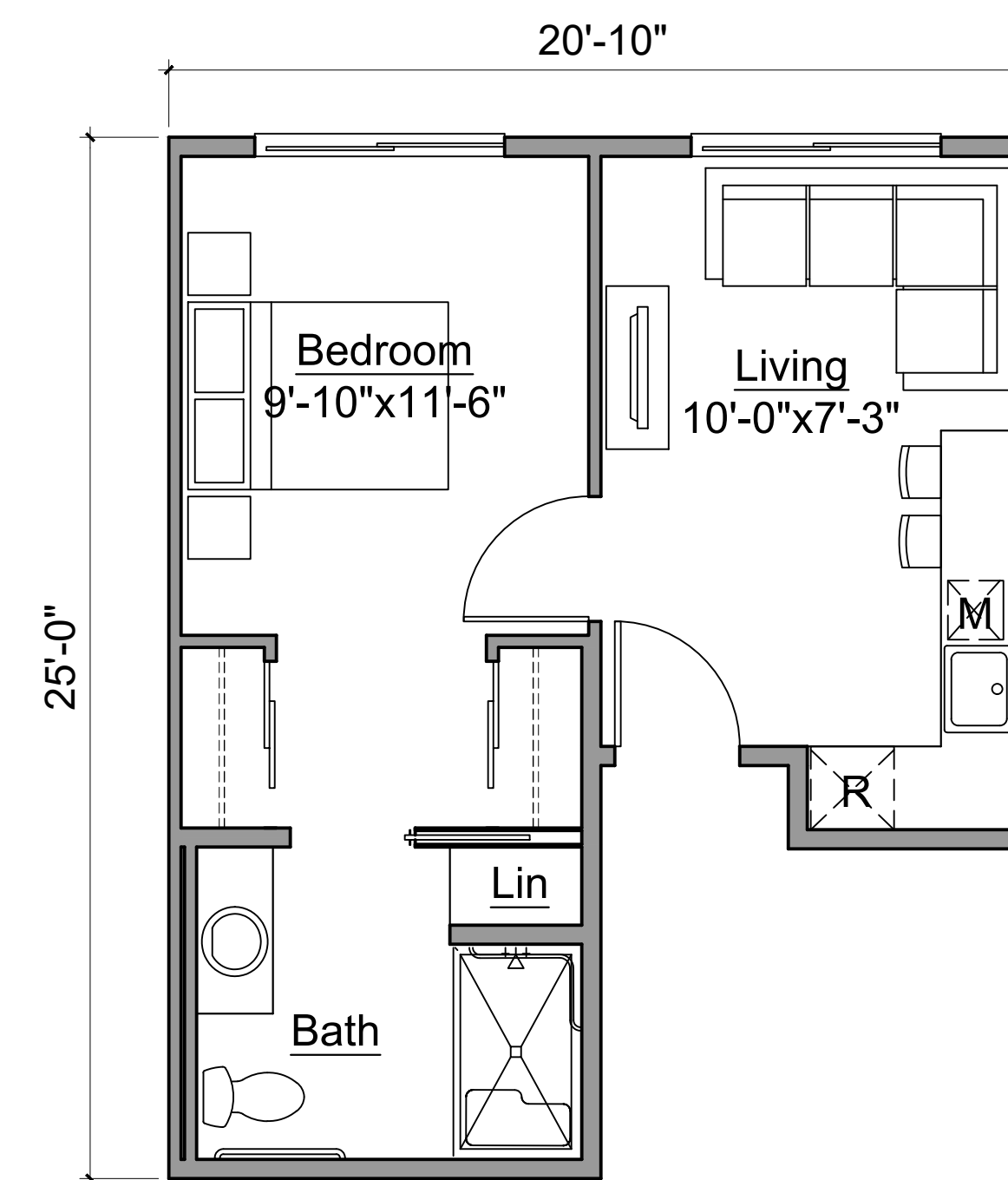
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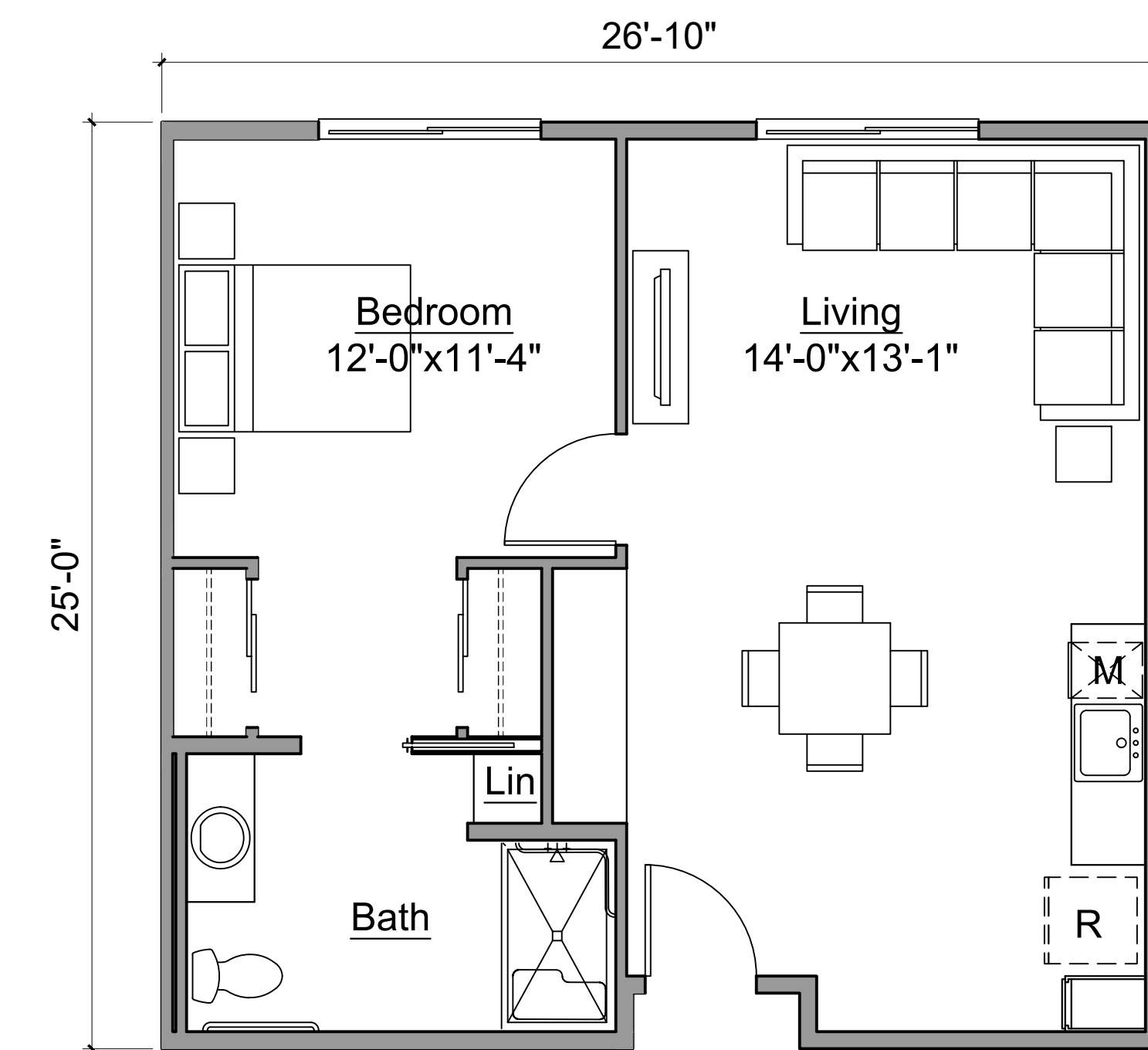
Assisted Living
Unit AL-0
± 349 Gross Sq. Ft.



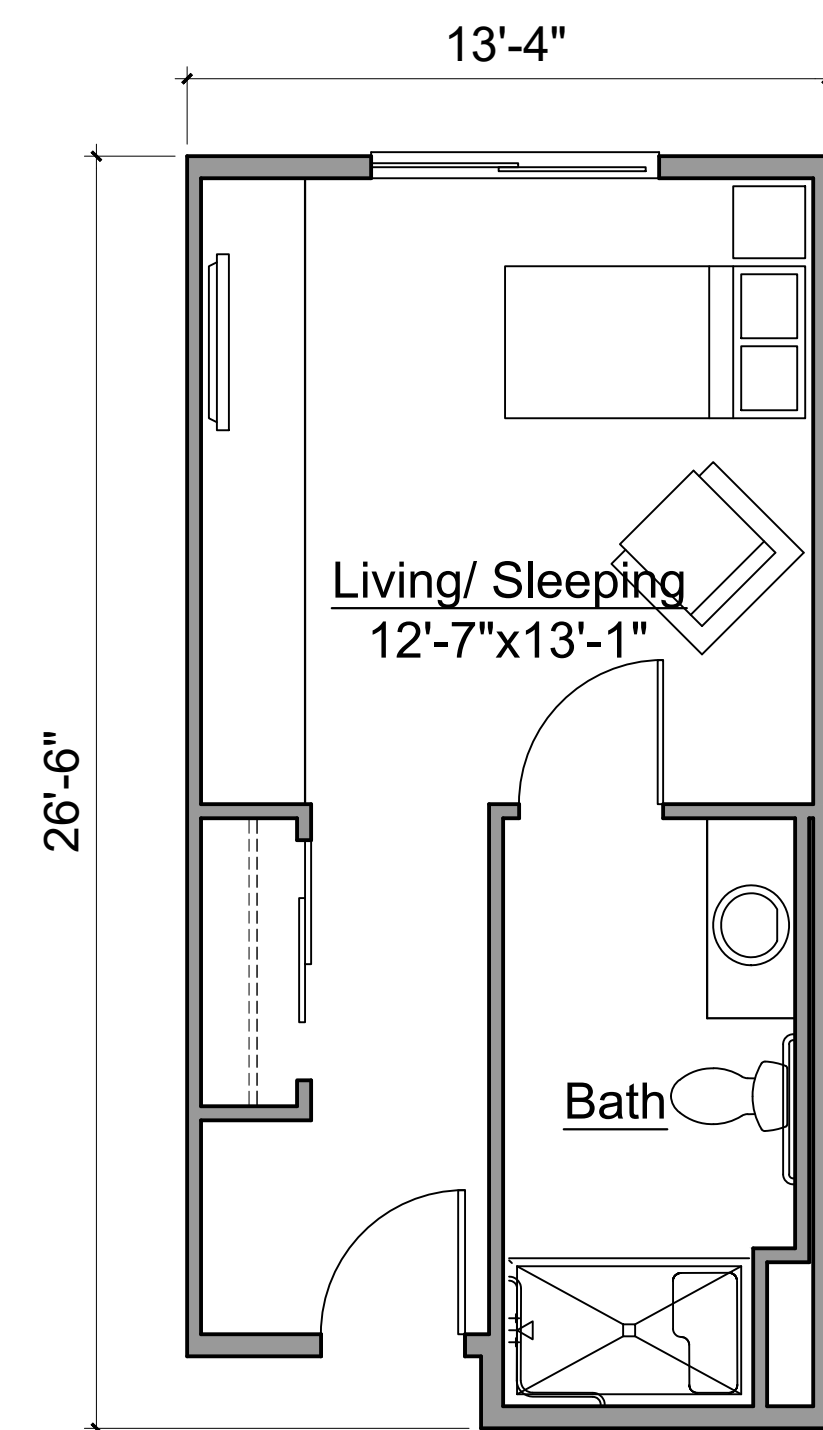
Assisted Living
Unit AL-0.1
± 329 Gross Sq. Ft.



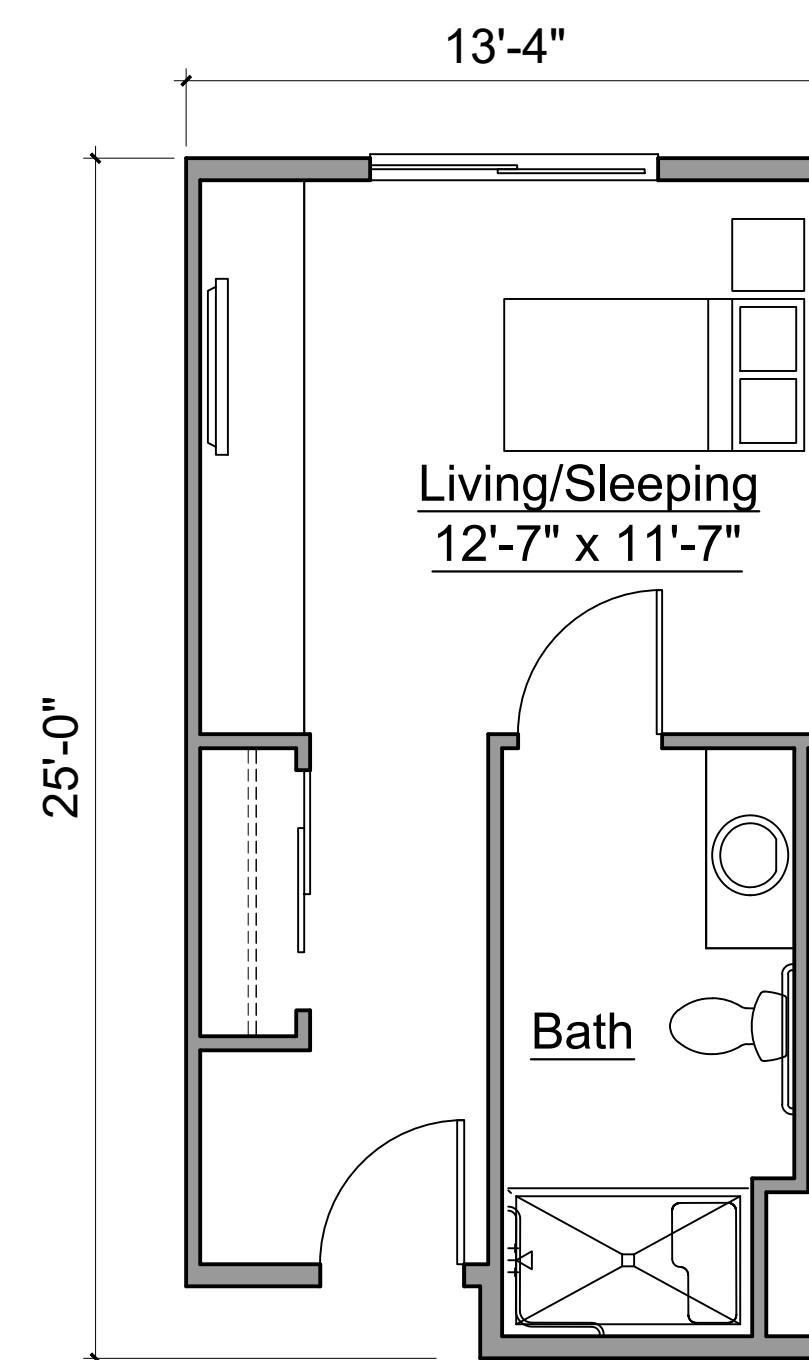
Assisted Living
Unit AL-1
± 433 Gross Sq. Ft.



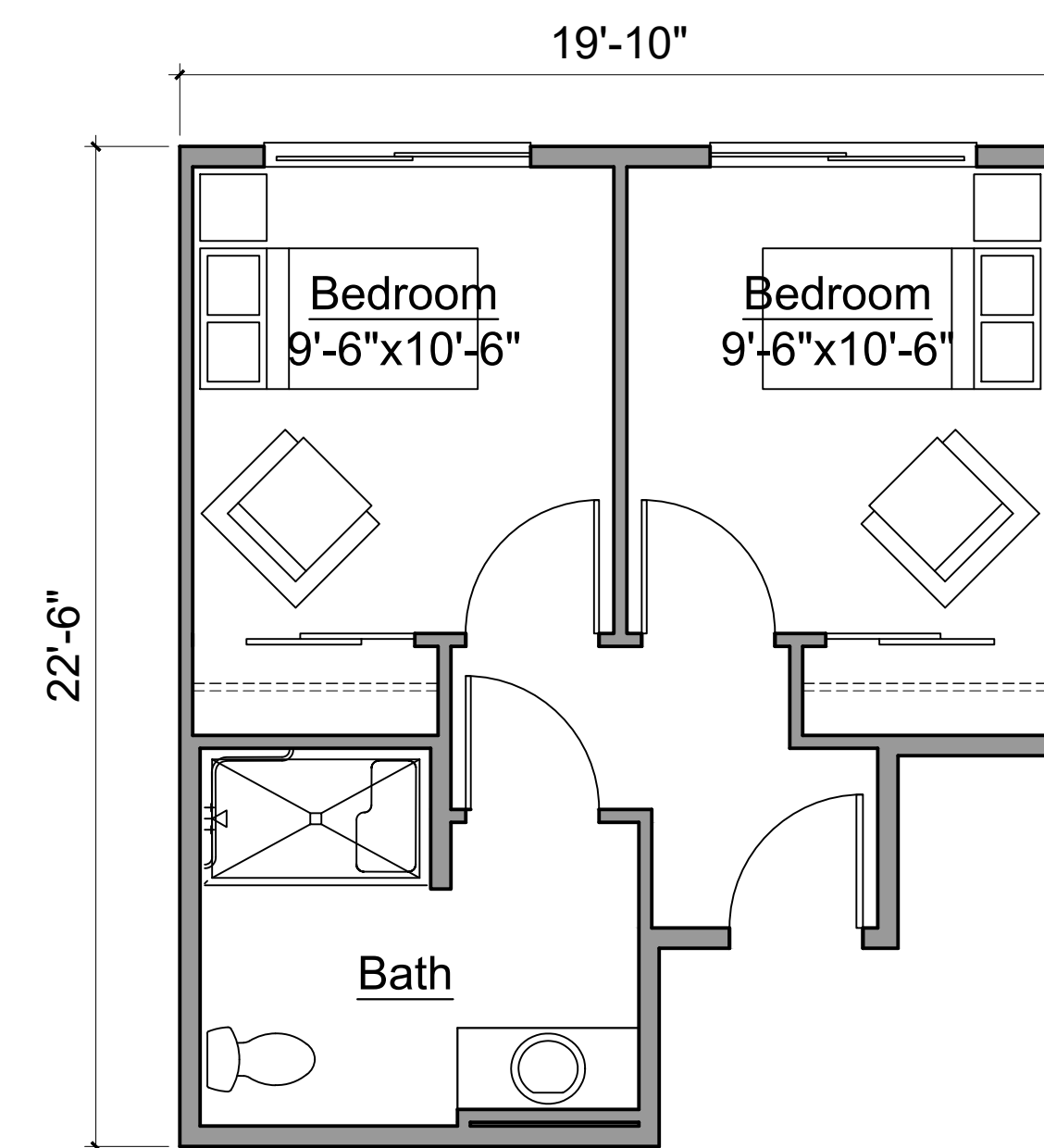
Assisted Living
Unit AL-1.1
± 668 Gross Sq. Ft.



Memory Care
Unit MC-0
± 348 Gross Sq. Ft.



Memory Care
Unit MC-0.1
± 329 Gross Sq. Ft.



Memory Care
Unit MC-2
± 393 Gross Sq. Ft.

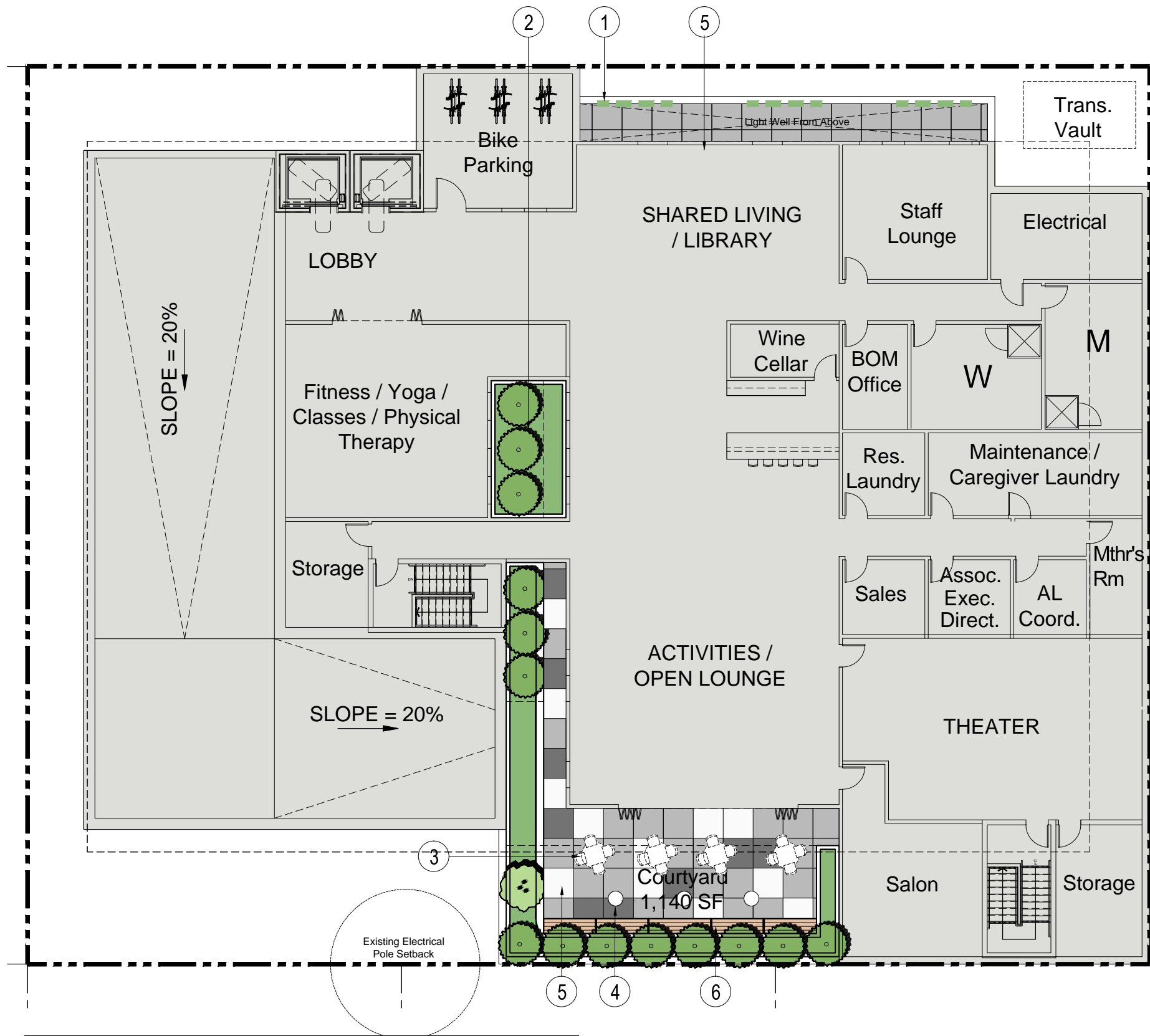
Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:42 AM

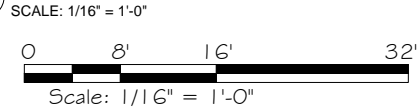
Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 16 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)



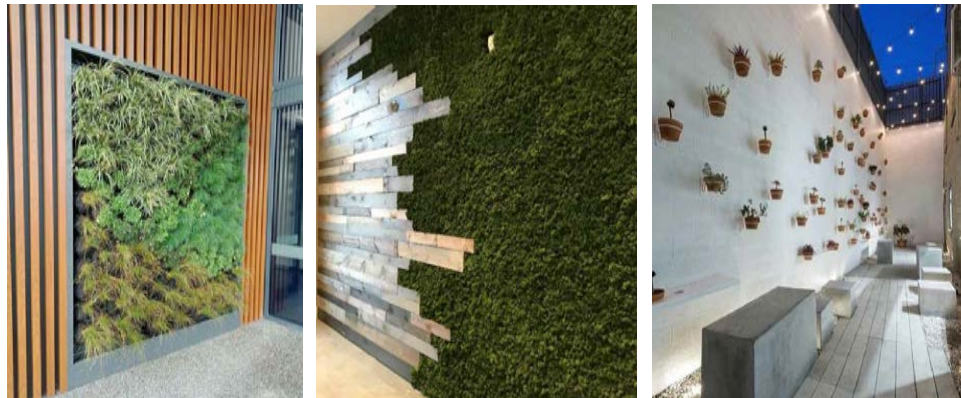
TOTAL LANDSCAPE / HARDSCAPE BREAKDOWN		
	LANDSCAPE SF	HARDSCAPE SF
BASEMENT LVL:	540.5 SF	1,157.17 SF
LEVEL 1:	1,631.3 SF	3,568.5 SF
LEVEL 2 MEMORY CARE PATIO:	52.5 SF	248.86 SF
LEVEL 5 ROOF DECKS:	825.2 SF	2,243.3 SF
TOTAL:	3,049.5 SF	7,217.86 SF

1 PRELIMINARY LANDSCAPE PLAN-BASEMENT LEVEL



KEYNOTES

1. WALLSCAPE / GREEN WALL OPTIONS:



2. BUILT-IN PLANTER

3. COFFEE TABLE

4. READING TABLE

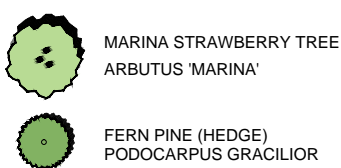
5. STAINED CONC. PAVING



6. BUILT-IN WOOD BENCH W/ ARM REST & SLOPING BACK CUSHION

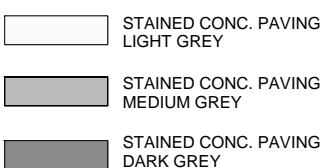


PLANTING LEGEND



SHRUBS & GROUNDCOVERS

PAVING LEGEND



825-837 S. HOLT AVENUE

PROJECT # 22013

06/28/2021

SQLA INC
Landscape Architects

2669 Saturn Street
BRE, CA, 92821
la@sqlainc.com

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F. 562-905-0880
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LP-1

HOLT AVE



1 PRELIMINARY LANDSCAPE PLAN-1ST LEVEL
SCALE: 1/16" = 1'-0"
0 8' 16' 32'
Scale: 1/16" = 1'-0"

KEYNOTES

1. BUILT-IN PLANTER
2. BENCH W/ ARM REST



3. CON. STAINED PAVING

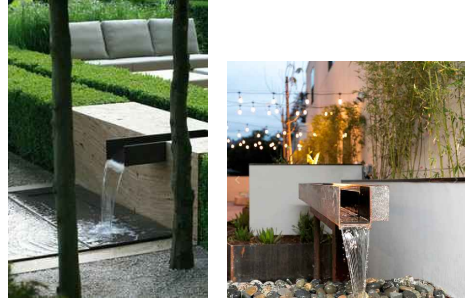


4. CABLE WIRING FOR VINE PLANTING

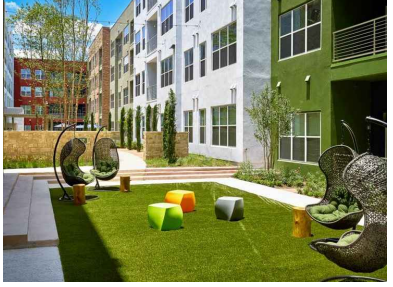


5. TABLE W/ CHAIRS

6. CUSTOM RUNNEL WATER FEATURE



7. SYNTHETIC GRASS LOUNGE AREA



8. OUTDOOR SOFA W/ COFFEE TABLE

9. STONE VENEER BLOCK WALL

8. BUILT-IN BBQ
9. FIBERGLASS PLANTER
10. DOG GATE & FENCE
11. FIREPIT W/ SOFA SEATING



12. RAISED BED VEGETABLE GARDEN



13. OUTDOOR DOG WASH STATION

PLANTING LEGEND

TREES

- ACER PALMATUM
'SANGOKAKU'
ACORAL BARK JAPANESE MAPLE
- ARBUTUS MARINA
STRAWBERRY TREE
- PODOCARPUS GRACILLIOR
FERN PINE
(SCREENING HEDGE)
- EXISTING STREET TREE
TO REMAIN

PAVING LEGENDS

- VINE CABLE PLANTING
- PLANTING
- STAINED CONC. PAVING
LIGHT GREY W/ LIGHT TSR FIN.
- STAINED CONC. PAVING
MEDIUM GREY W/ LIGHT TSR FIN.
- STAINED CONC. PAVING
DARK GREY W/ LIGHT TSR FIN.
- NATURAL COLOR CONC. PAVING

825-837 S. HOLT AVENUE

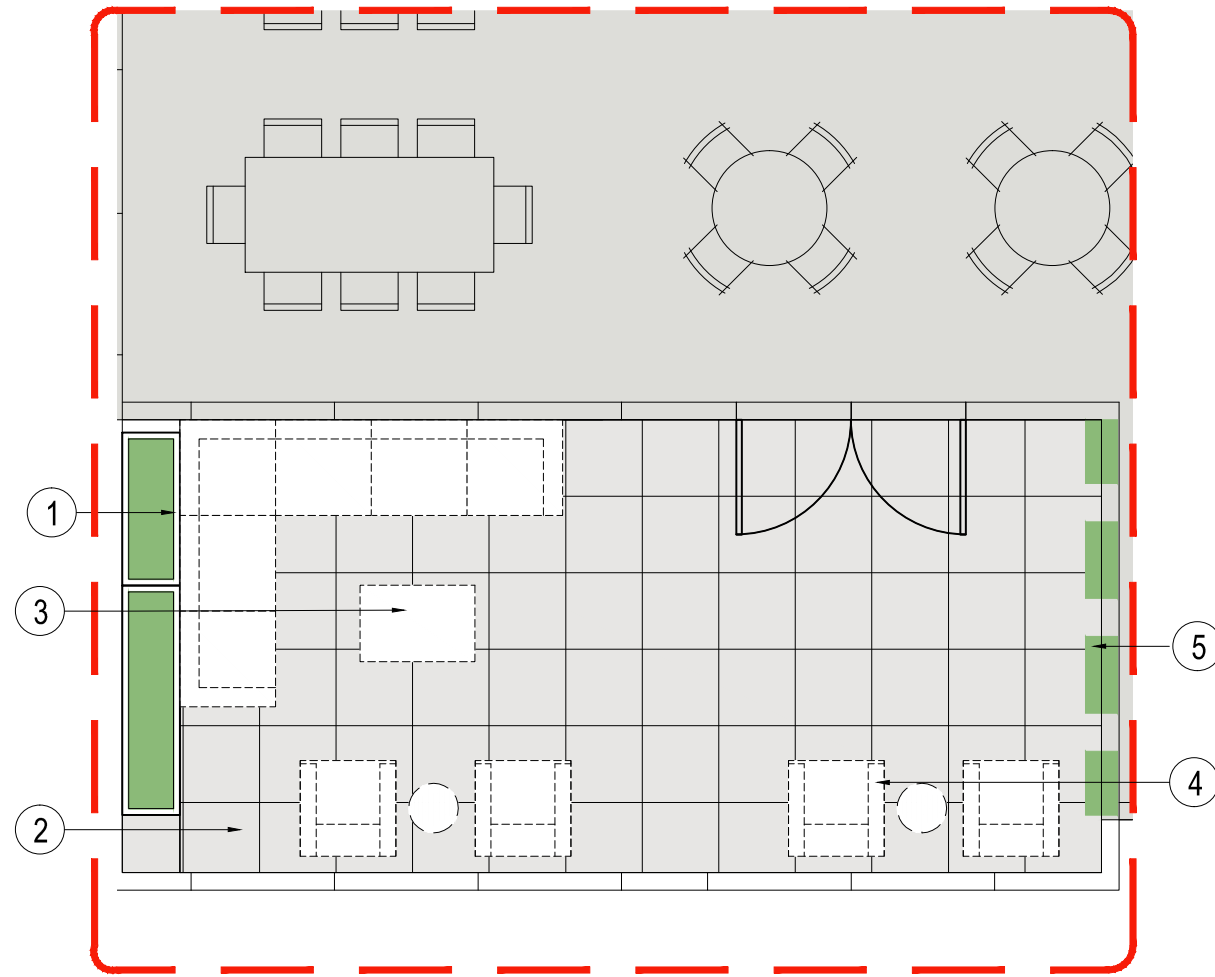
PROJECT # 22013 06/28/2021

SQLA INC
Landscape Architects

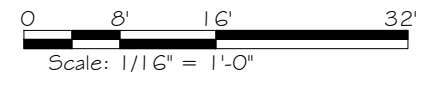
2669 Saturn Street
BRE, CA, 92821
la@sqlainc.com

T. 562-905-0800
F. 562-905-0880
www.sqlainc.com

LP-2

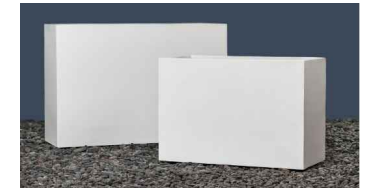


1 PRELIMINARY LANDSCAPE PLAN - 2ND LVL MEMORY CARE PATIO N
SCALE: 1/8" = 1'-0"



KEYNOTES

1. RECTANGULAR FIBERGLASS PLANTER

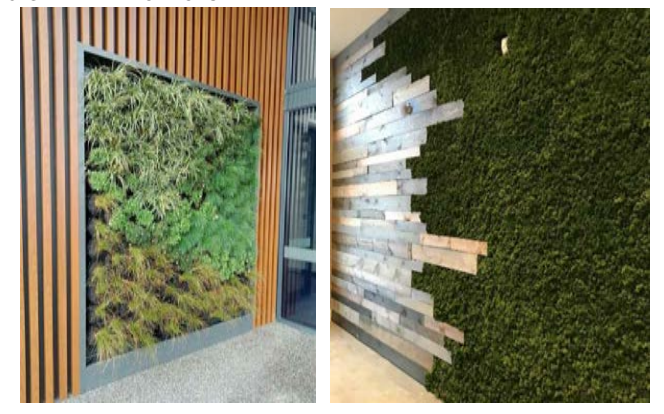


2. 2' X 2' PEDESTAL PAVERS


3. SOFA SEATING W/ TABLE

4. CHAIRS W/ SIDE TABLES

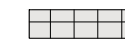
5. GREEN WALL OPTIONS:

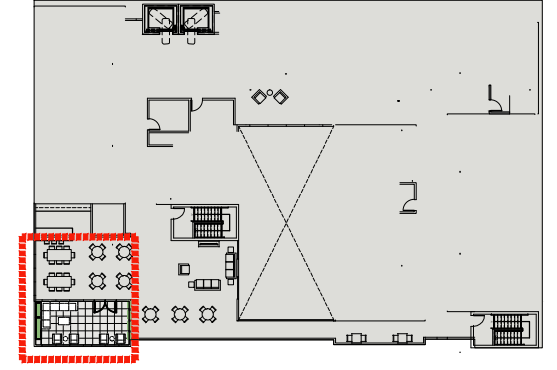


PLANTING LEGEND

 SHRUBS & GROUNDCOVERS

PAVING LEGEND

 2' X 2' PEDESTAL PAVERS



KEYMAP - N.T.S.

825-837 S. HOLT AVENUE

PROJECT # 22013

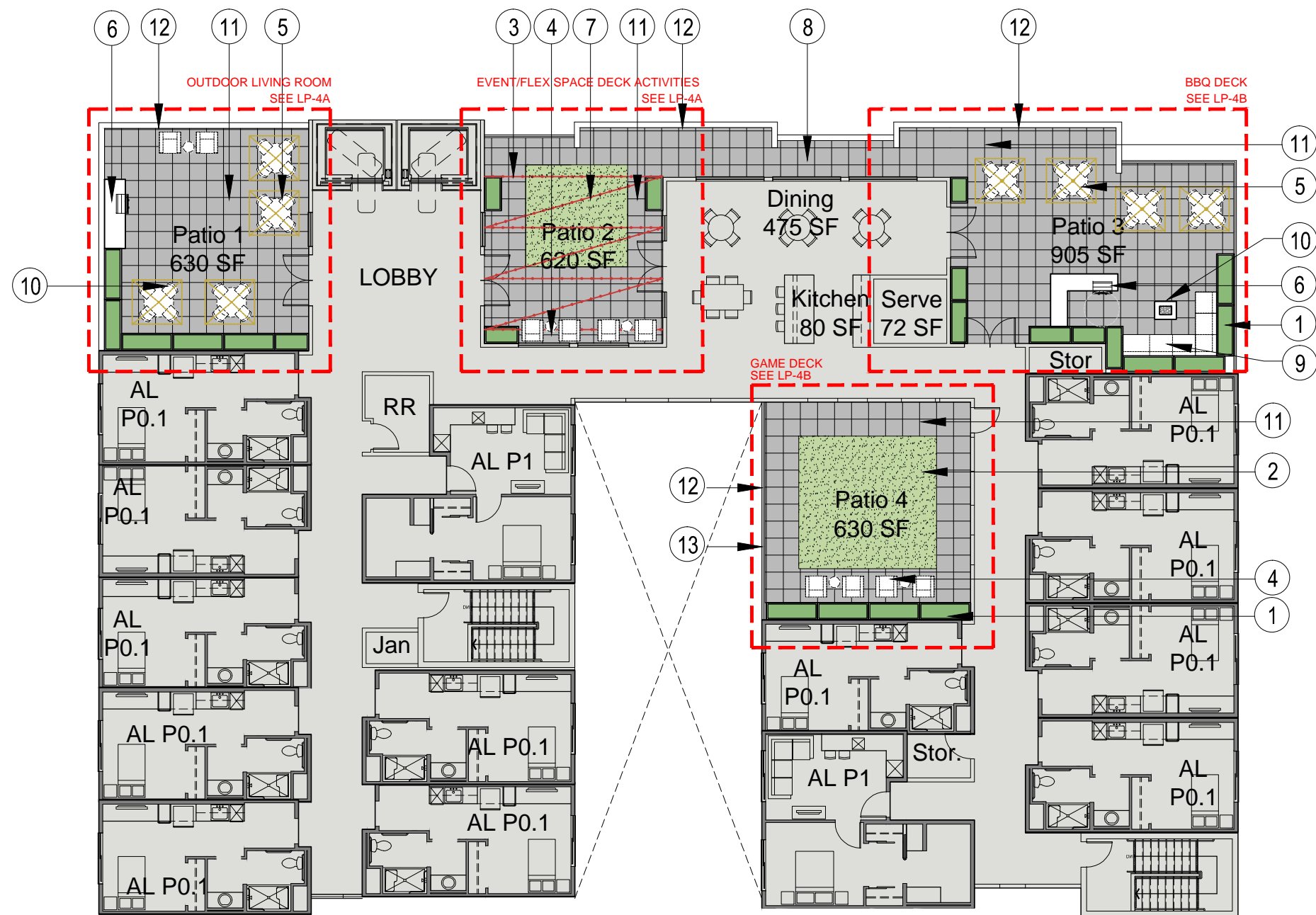
06/28/2021


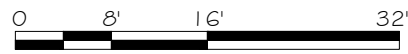
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LP-3



1 PRELIMINARY LANDSCAPE PLAN - 5TH LEVEL
 SCALE: 1/16" = 1'-0" 

 Scale: 1/16" = 1'-0"

PAVING LEGENDS

-  PLANTING
-  SYNTHETIC GRASS
-  CONC. PAVING TILE

KEYNOTES

1. FIBERGLASS PLANTER



2. SYNTHETIC GRASS (YOGA)



3. STRINGLIGHT

4. COUCH SEATING W/ TABLES

5. ROUND TABLE W/ UMBRELLAS

6. BBQ COUNTER



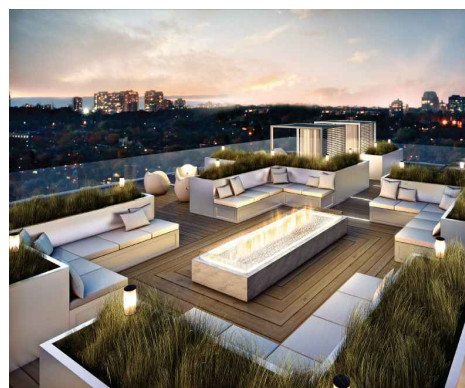
7. SYNTHETIC GRASS (LIVE MUSIC/YOGA)



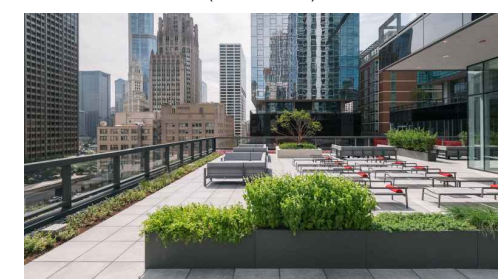
8. COORIDOR PER ARCH PLAN

9. OUTDOOR SOFA

10. FIRE PIT



11. PEDESTAL PAVER (PORCELAIN)



12. TRELLIS STRUCTURE W/ SHADE FABRIC (ON ALL DECKS)



13. 10'H SAFETY NET MESH WALL



825-837 S. HOLT AVENUE

PROJECT # 22013

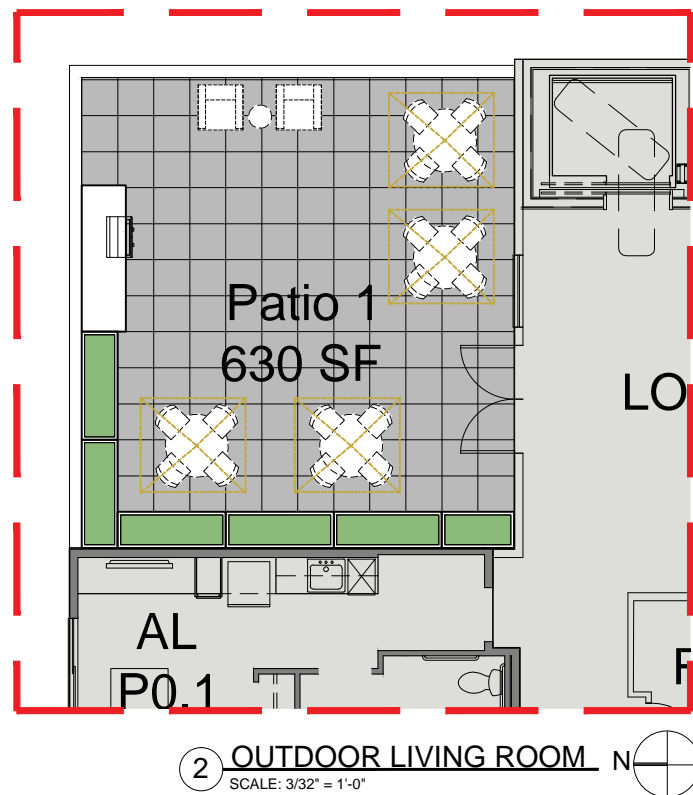
06/28/2021

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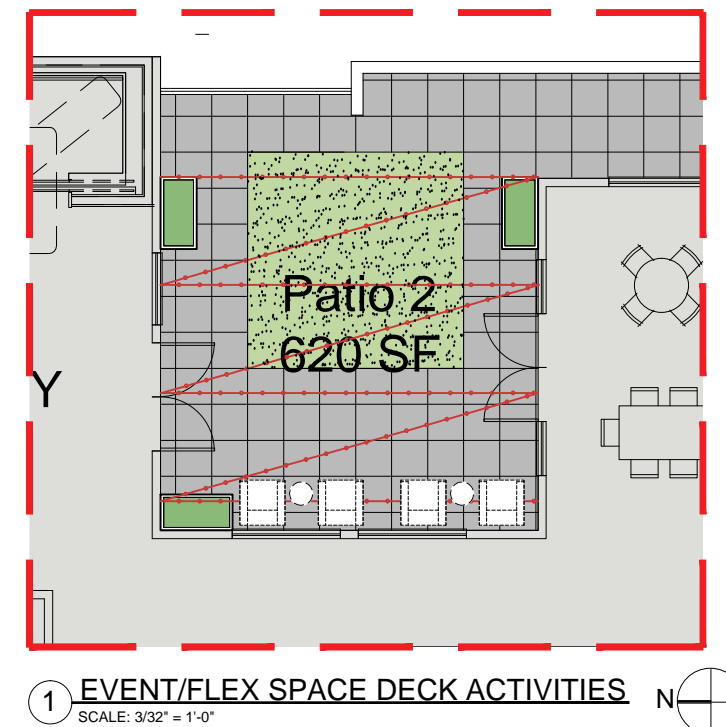
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 la@sqlainc.com

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LP-4



OUTDOOR COOKING / DINING



OUTDOOR PAINTING



LIVE MUSIC / ENTERTAINMENT



MEDITATION / STRETCHING EXERCISES

825-837 S. HOLT AVENUE

PROJECT # 22013

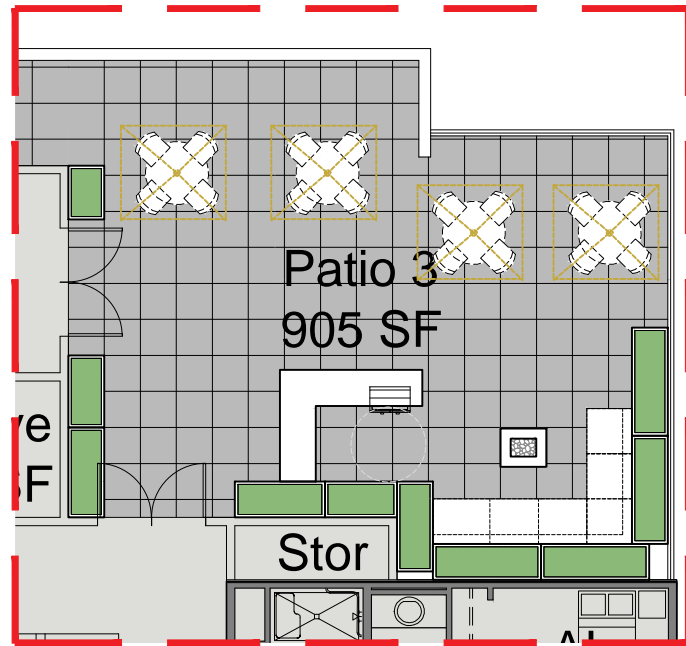
06/28/2021

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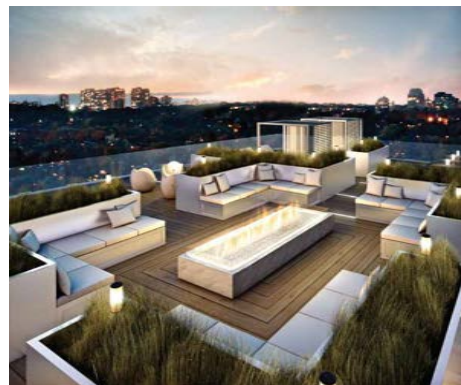
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la@sqlainc.com

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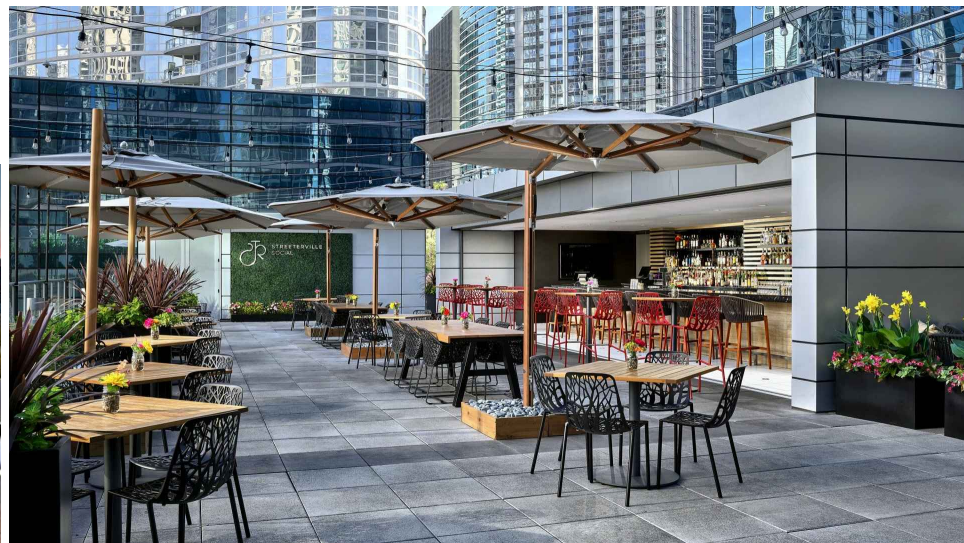
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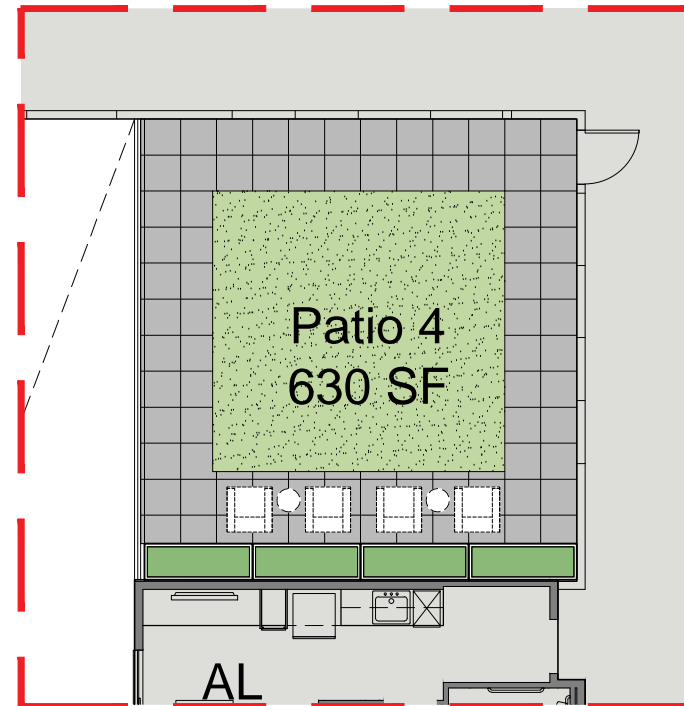
OUTDOOR COOKING



FIRE PIT SEATING AREA



OUTDOOR DINING



BOCCE BALL



GROUP GAMES / ACTIVITIES



PUTTING GREEN



CIRCUIT WALKS



CORNHOLE

825-837 S. HOLT AVENUE

PROJECT # 22013


06/28/2021

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la@sqlainc.com

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F. 562-905-0880
www.sqlainc.com

LP-4B

		
PODOCARPUS GRACILLIOR FERN PINE (HEDGE FORM)	ARBUTUS 'MARINA' STRAWBERRY TREE	ACER PALMATUM 'SANGOKAKU' CORAL BARK JAPANESE MAPLE

1
TREE SELECTIONS

SCALE: N.T.S

825-837 S. HOLT AVENUE

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:43 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 17 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)



and Design



Landscape Architecture / Consulting Arboriculture

2351 Bouganvillea Cir. Corona, CA 92879 - (909) 528-3257 - treesanddesign@gmail.com - CA 5785 - WE-9665A

Tree Report

March 11, 2020

Client: Daniel Kianmahd, The Panoama Group, Inc.
8665 Wilshire Blvd, Suite 208
Beverly Hills, CA 90211

Project: Senior Housing Development

Location: 825-837 South Holt Avenue, Los Angeles, CA 90035

Arborist: Jeffrey Trojanowski, ASLA, ISA; Trees and Design
RLA - CA-5785
ISA - WE-9665A

Contents:

1. Introduction/Instructions/Limitations
2. Tree Survey Details
3. Tree Survey Comments
4. Arborist Disclosure Statement
5. Appendix A: Arborist Certifications
6. Appendix B: Tree Photo Catalogue

1.0 Introduction/Instructions/Limitations:

- 1.1 This report and letter was commissioned by Daniel Kianmahd of The Panorama Group, Inc. to survey trees for health and sustainability for the trees within the limits of 825-837 South Holt Avenue, in the City of Los Angeles, CA.
- 1.2 The proposed development will develop the existing properties into a one lot combined parcel. The trees on this property have been inventoried, tagged, and surveyed for their health and suitability.
- 1.3 The tree survey was taken on Sunday March 8, 2020.
- 1.4 The limits of the tree report are within property lines of the existing sites. Delineated with chain link fence and block wall along the north, south and west property lines, and Holt Avenue to the East.
- 1.5 This tree report and inventory only reflects the trees on site at time of the report. No shrubs were surveyed on this report and inventory.

- 1.6 All the trees have been inspected from the ground level using visual observation. If a more detailed report is needed, it will be outlined within the recommendations.
- 1.7 Trees are living organisms whose conditions and health can change rapidly. The limitation of this report is 6 months from the date of the survey, due to human/vehicle interaction and weather.
- 1.8 Trees that are less than 8" DBH, trees that have been cut down or damaged, and only have smaller branches upright becoming trunks, or trees that were dead were not considered for this inventory, as there is no monetary or mitigatable value.

2.0 Tree Survey Details:

- 2.1 The tree survey includes all alive trees that will be affected by construction, as shown on the attached plan. Each tree has been tagged, given a number for identification, shown on the plan, can given a category based on its quality and value.
- 2.2 The health categories are as follows:

G – Good	These trees are in good health and structure, free of disease and infestation
F – Fair	These trees are in moderate/fair health, and have structural defects and/or poor growth habits.
P – Poor	These trees are in poor health, have structural defects and/or poor growth habits, and are dying or dead.
- 2.3 The tree health categories were founded based on the five different factors of the trees. These are: Roots, Trunk, Scaffold Branches, Small Branches/Twigs, and Foliage/Buds. Each factor has two categories: health and structure. Each category has four levels (1-4) to rate the category, giving a tree a score between 10-40. They are then assigned a percentage for health.
- 2.4 The tree heights and widths were measured with a Merritt Hypsometer.
- 2.5 The stem diameters have been taken at approximately 4'-6" above the ground, or Diameter at Breast Height (DBH)

3.0 Tree Survey Comments:

- 3.1 Tree 1 – *Platanus racemosa* (California Sycamore) 29.5" DBH, Height and Spread, 65' x 45'. Tree health percentage 90%. Tree in overall good health. The roots are growing over the sidewalk and the curb. If City sidewalk is removed, this will cause damage to root system. This is a protected tree. (Photos 1-3)
- 3.2 Tree 2 – *Ficus carica* (Edible Fig) 9" DBH, Height and Spread, 12' x 20'. Tree health percentage 68%. Tree in fair health. Irregular growth. Close to existing structure and growing at an angle away from structure. (Photo 4)
- 3.3 Tree 3 – *Platanus racemosa* (California Sycamore) 29" DBH, Height and Spread, 65' x 45'. Tree health percentage 90%. Tree in overall good health. The roots are growing over the

sidewalk and the curb. Tree roots are also lifting sidewalk. If City sidewalk is removed, this will cause damage to root system. This is a protected tree. (Photos 5-8)

- 3.4 Tree 4 – *Platanus racemosa* (California Sycamore) 40" DBH, Height and Spread, 65' x 48'. Tree health percentage 90%. Tree in overall good health. The roots are growing over the sidewalk and the curb and disrupting the water meter box. One stem is dead and needs to be removed. If City sidewalk is removed, this will cause damage to root system. This is a protected tree. (Photos 9-11)
- 3.5 Tree 5 – *Juniperus chinensis* (Juniper) 12" DBH, Height and Spread, 15' x 8'. Tree health percentage 90%. Tree in overall good health. The tree is at the back of the property under the transmission power lines. The tree has been topped. (Photos 12)
- 3.6 Tree 6 – *Juniperus chinensis* (Juniper) 12" DBH, Height and Spread, 10' x 12'. Tree health percentage 90%. Tree in overall good health. The tree is at the back of the property under the transmission power lines. The tree has been topped. (Photos 13)
- 3.7 Tree 7 – *Melaluca quinquinervia* (Paperbark Tree) 16" DBH, Height and Spread, 15' x 10'. Tree health percentage 50%. Tree in poor health. Growing between two buildings. The tree is topped and the scaffold branches have been removed. (Photos 14-15)
- 3.8 Tree 8 – *Ficus microcarpa* (Chinese Banyan) 16" multi trunk DBH, Height and Spread, 18' x 5'. Tree health percentage 75%. Tree in fair health. Tree has been topped and trimmed as a screen. (Photos 16)
- 3.9 Tree 9 – *Melaluca quinquinervia* (Paperbark Tree) 10" DBH, Height and Spread, 15' x 5'. Tree health percentage 50%. Tree in poor health. Growing between two buildings. The tree is topped and the scaffold branches have been removed. (Photos 17-19)
- 3.10 Tree 10 – *Melaluca quinquinervia* (Paperbark Tree) 14" DBH, Height and Spread, 15' x 5'. Tree health percentage 50%. Tree in poor health. Growing between two buildings. The tree is topped and the scaffold branches have been removed. (Photos 20, 21)
- 3.11 Tree 11 – *Melaluca quinquinervia* (Paperbark Tree) 8" multi trunk DBH, Height and Spread, 12' x 5'. Tree health percentage 10%. Tree in poor health. Growing between two buildings. The tree is topped and the scaffold branches have been removed. Tree looks dead with no leaves. (Photos 22, 23)
- 3.12 Tree 12 – *Jacaranda mimosifolia* (Jacaranda) 11.5" multi trunk DBH, Height and Spread, 32' x 20'. Tree health percentage 90%. Tree in good health. Street tree. (Photo 24)
- 3.13 Tree 13 – *Lagerstroemia indica* (Crape Myrtle) 2.5" multi trunk DBH, Height and Spread, 10' x 5'. Tree health percentage 90%. Tree in good health. Tree is small, but a street tree. (Photo 25)

4.0 Arborist Disclosure Statement:

Arborists are tree specialists who use their experience, education, knowledge, and training to examine and protect trees, recommend measures to enhance the beauty and health of the trees, and attempt to reduce the risk of living near trees. Clients may

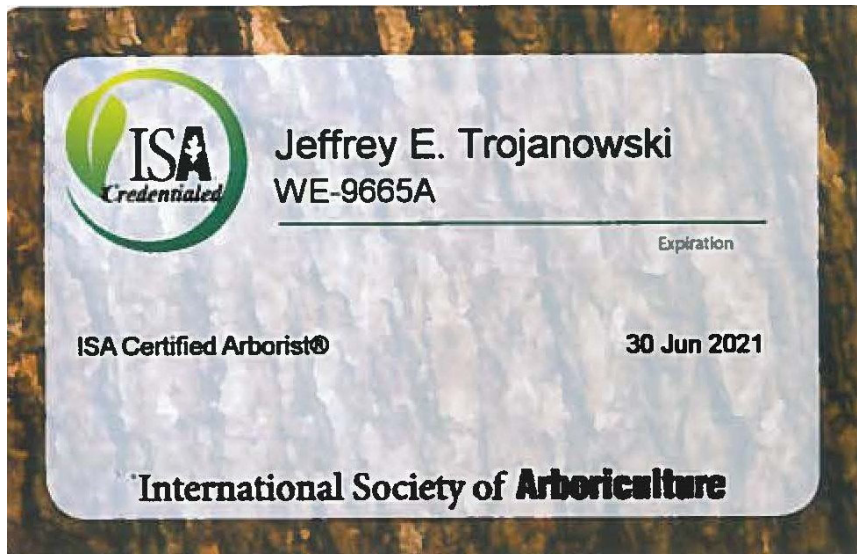
choose to accept or disregard the recommendations of the arborist, or seek additional advice.

An Arborist cannot detect every condition that could possibly lead to the structural failure of a tree. Trees are living organisms that fail in ways we do not fully understand. Conditions are often hidden within trees and below ground. Arborist cannot guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments, like medicine, cannot be guaranteed.

Treatment, root cutting, pruning and removal of trees may involve considerations beyond the scope of the arborist's services such as property boundaries, property ownership, site lines, disputes between neighbors, landlord-tenant matters, etc. Arborists cannot take such issues into account unless complete and accurate information is given to the arborist. The person hiring the arborist accepts full responsibility for authorizing the recommended treatment or remedial measures.

Trees can be managed, but they cannot be controlled. To live near a tree one is accepting some degree of risk. The only way to eliminate all tree risks is to remove all trees.

5.0 Appendix A: Arborist Certifications



6.0 Appendix B: Tree Photo Catalogue

25 Photos



Photo1



Photo2



Photo3



Photo4



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9



Photo10



Photo 11



Photo12



Photo13



Photo14



Photo15



Photo16



Photo17



Photo18



Photo19



Photo20



Photo 21



Photo 22



Photo 23



Photo 24



Photo 25

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:44 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 18 of 20.
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REFERRAL FORMS:

TRANSPORTATION STUDY ASSESSMENT

DEPARTMENT OF TRANSPORTATION - REFERRAL FORM

RELATED CODE SECTION: Los Angeles Municipal Code Section 16.05 and various code sections.

PURPOSE: The Department of Transportation (LADOT) Referral Form serves as an initial assessment to determine whether a project requires a Transportation Assessment.

GENERAL INFORMATION

- Administrative: Prior to the submittal of a referral form with LADOT, a Planning case must have been filed with the Department of City Planning.
- All new school projects, including by-right projects, must contact LADOT for an assessment of the school's proposed drop-off/pick-up scheme and to determine if any traffic controls, school warning and speed limit signs, school crosswalk and pavement markings, passenger loading zones and school bus loading zones are needed.
- Unless exempted, projects located within a transportation specific plan area may be required to pay a traffic impact assessment fee regardless of the need to prepare a transportation assessment.
- Pursuant to LAMC Section 19.15, a review fee payable to LADOT may be required to process this form. The applicant should contact the appropriate LADOT Development Services Office to arrange payment.
- LADOT's Transportation Assessment Guidelines, VMT Calculator, and VMT Calculator User Guide can be found at <http://ladot.lacity.org>.
- A transportation study is not needed for the following project applications:
 - Ministerial / by-right projects
 - Discretionary projects limited to a request for change in hours of operation
 - Tenant improvement within an existing shopping center for change of tenants
 - Any project only installing a parking lot or parking structure
 - Time extension

SPECIAL REQUIREMENTS

When submitting this referral form to LADOT, include the completed documents listed below.

- ☐ Copy of Department of City Planning Application (CP-7771.1).
- ☐ Copy of a fully dimensioned site plan showing all existing and proposed structures, parking and loading areas, driveways, as well as on-site and off-site circulation.
- ☐ If filing for purposes of Site Plan Review, a copy of the Site Plan Review Supplemental Application.
- ☐ Copy of project-specific VMT Calculator¹ analysis results

LADOT DEVELOPMENT SERVICES DIVISION OFFICES: Please route this form for processing to the appropriate LADOT Office as follows:

Metro	West LA	Valley
213-972-8482 100 S. Main St, 9 th Floor Los Angeles, CA 90012	213-485-1062 7166 W. Manchester Blvd Los Angeles, CA 90045	818-374-4699 6262 Van Nuys Blvd, 3 rd Floor Van Nuys, CA 91401

TO BE VERIFIED BY PLANNING STAFF PRIOR TO LADOT REVIEW

1. PROJECT INFORMATION

Case Number: _____

Project Name: _____

Address: _____

Project Description: _____

Seeking Existing Use Credit (will be calculated by LADOT): Yes _____ No _____ Not sure _____

Applicant Name: _____

Applicant E-mail: _____ Applicant Phone: _____

2. PROJECT REFERRAL TABLE

	Land Use (list all)	Size / Unit	Daily Trips¹
Proposed			
	<i>Total trips¹:</i>		

- a. Does the proposed project involve a discretionary action? **Yes** ☐ **No** ☐
- b. Would the proposed project generate 250 or more daily vehicle trips¹? **Yes** ☐ **No** ☐
- c. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station²? **Yes** ☐ **No** ☐

If **YES** to **a.** and **b.** or **c.**, or to **all** of the above, the Project must be referred to LADOT for further assessment.

¹To calculate the project's total daily trips, use the VMT Calculator. Under 'Project Information', enter the project address, land use type, and intensity of all proposed land uses. Select the '+' icon to enter each land use. After you enter the information, copy the 'Daily Vehicle Trips' number into the total trips in this table. Do not consider any existing use information for screening purposes. For additional questions, consult LADOT's [VMT Calculator User Guide](#) and the LADOT Transportation Assessment Guidelines (available on the LADOT website).

² Relevant transit lines include: Metro Red, Purple, Blue, Green, Gold, Expo, Orange, and Silver line stations; and Metrolink stations.

Verified by: Planning Staff Name: Original signed by Alex Truong Phone: (213) 978-3308

Signature: _____ Date: 7/30/20

TO BE COMPLETED BY LADOT

3. PROJECT INFORMATION

	Land Use (list all)	Size / Unit	Daily Trips
Proposed	Senior Units (Eldercare)	80 Units	
	Total new trips:		127
Existing	Duplexes	3 Units	
	Total existing trips:		40
	Net Increase / Decrease (+ or -)		87

- a. Is the project a single retail use that is less than 50,000 square feet? Yes ☐ No ☒
- b. Would the project generate a net increase of 250 or more daily vehicle trips? Yes ☐ No ☒
- c. Would the project result in a net increase in daily VMT? Yes ☒ No ☐
- d. If the project is replacing an existing number of residential units with a smaller number of residential units, is the proposed project located within one-half mile of a heavy rail, light rail, or bus rapid transit station? Yes ☐ No ☒
- e. Does the project include the construction, or addition of 50 or more dwelling units or guest rooms or combination thereof, and/or 50,000 or more square feet of non-residential? Yes ☐ No ☒
- f. Project size:
- i. Does the project contain a lot that is 0.5-acre or more in total gross area? Yes ☐ No ☒
- ii. Is the project's frontage 250 linear feet or more along a street classified as an Avenue or Boulevard per the City's General Plan? Yes ☐ No ☒
- iii. Is the project's building frontage encompassing an entire block along a street classified as an Avenue or Boulevard per the City's General Plan? Yes ☐ No ☒

VMT Analysis

If YES to a. and NO to d. a VMT analysis is NOT required.

If YES to both b. and c.; or to d. a VMT analysis is required.

Access, Safety, and Circulation Assessment

If YES to b., a project access, safety, and circulation evaluation may be required.

If YES to b. and e. and either f.i., f.ii., or f.iii., an access assessment may be required.

LADOT Comments:

Please note that this form is not intended to address the project's site access plan, driveway dimensions and location, internal circulation elements, dedication and widening, etc. These items require separate review and approval by LADOT. Qualifying Existing Use to be determined per LADOT's Transportation Assessment Guidelines.

4. Specific Plan with Trip Fee or TDM Requirements: Yes ☐ No ☒

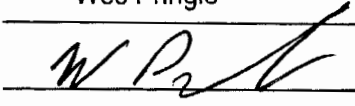
Fee Calculation Estimate: _____

VMT Analysis Required (Question b. satisfied): Yes ☐ No ☒

Access, Safety, and Circulation Evaluation Required (Question b. satisfied): Yes ☐ No ☒

Access Assessment Required (Question b., e., and either f.i., f.ii. or f.iii satisfied): Yes ☐ No ☒

Prepared by DOT Staff Name: Wes Pringle Phone: (213) 972-8482

Signature:  Date: August 5, 2020

Communication from Public

Name: Seth Wulkan

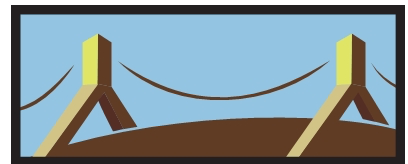
Date Submitted: 11/29/2021 09:49 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 19 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

825 SOUTH HOLT AVENUE PROJECT

Noise Technical Report



Prepared by DKA Planning
20445 Prospect Road, Suite C
San Jose, CA 95129
November 2021

Noise Analysis

1. Introduction

This technical report evaluates noise and vibration impacts that would be generated by construction and operation of the Proposed Project at 825 South Holt Avenue in the City of Los Angeles. The analysis compares these impacts to applicable regulations and thresholds of significance. Noise measurement technical reports, calculation worksheets, and a map of noise receptors and measurement locations are included in the Technical Appendix to this report.

2. Environmental Setting

a) Fundamentals of Noise

(1) Introduction to Noise

(a) Characteristics of Sound

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

Table 1
A-Weighted Decibel Scale

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

(b) Noise Definitions

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

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

Maximum Noise Level (L_{max}): L_{max} represents the maximum instantaneous noise level measured during a given time period.

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

(c) Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise. According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.¹ The World Health Organization (WHO) reports that adults should not be exposed to sudden “impulse” noise events of 140 dB or greater. For children, this limit is 120 dB.²

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA,

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

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

L_{eq} and that individual noise events of 45 dBA or higher be limited.³ Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq} . Individual exterior events of 60 dBA or higher should also be limited. Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA, L_{eq} and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

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

(d) Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as “point sources,” can decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile “line” sources such as roadways decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can generally reduce noise levels by up to 15 dBA.⁶ The effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers. It should be noted that because decibels are logarithmic units, they cannot just be added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

b) Regulatory Framework

(1) Noise

³ Ibid.

⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

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

⁶ California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

(a) *Federal*

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

(b) *State*

2017 General Plan Guidelines

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

Table 2
State of California Noise/Land Use Compatibility Matrix

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)						
	<	55	60	65	70	75	80 >
Residential – Low Density Single-Family, Duplex Mobile Homes	NA						
		CA					
					NU		
						CU	
Residential – Multi-Family	NA						
		CA					
					NU		
						CU	
Transient Lodging – Motels, Hotels	NA						
		CA					
					NU		
						CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA						
		CA					
					NU		
						CU	
Sports Arenas, Outdoor Spectator Sports		CA					
						CU	
Playgrounds, Neighborhood Parks	NA						
					NU		
						CU	
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA						
					NU		
							CU
Office Buildings, Business Commercial and Professional	NA						
				CA			
						NU	
Industrial, Manufacturing, Utilities, Agriculture	NA						
				CA			
						NU	

NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix D), Figure 2, 2017.

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

The State has also established noise insulation standards for new multi-family residential units, hotels, and motels that are subject to relatively high levels of noise from transportation. The noise insulation standards, collectively referred to as the California Noise Insulation Standards (Title 24, California Code of Regulations) set forth an interior standard of 45 dBA CNEL for habitable rooms. The standards require an acoustical analysis which indicates that dwelling units meet this interior standard where such units are proposed in areas subject to exterior noise levels greater than 60 dBA CNEL. Local jurisdictions typically enforce the California Noise Insulation Standards through the building permit application process.

(c) *City of Los Angeles*

General Plan Noise Element

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

Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC) contains regulations that would regulate noise from the Project's temporary construction activities.

Section 41.40(a) would prohibit specific Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit

such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday, or at any time on any Sunday. These restrictions serve to limit specific Project construction activities to Monday through Friday 7:00 A.M. to 9:00 P.M., and 8:00 A.M. to 6:00 P.M. on Saturdays or national holidays.

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

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

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

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated in a residential zone or within 500 feet of any residential zone. Of particular importance to construction activities is subdivision (a), which institutes a maximum noise limit of 75 dBA as measured at a distance of 50 feet from the activity for the types of construction vehicles and equipment that would likely be used in the construction of the Project. However, the LAMC notes that these limitations would not necessarily apply if it can be proven that the Project's compliance would be technically infeasible despite the use of noise-reducing means or methods.

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

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

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

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

In addition, the LAMC regulates long-term operations of land uses, including but not limited to the following regulations.

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

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

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

- (a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.
- (b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:50 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 20 of 20.
(Please note: The approximately number of files is 20. However, there could be additional files, depending on the need to split up file sizes as the files are being uploaded.)

any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

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

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

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

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

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

c) Existing Conditions

(1) Noise-Sensitive Receptors

Land uses sensitive to noise may include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Local receptors mainly include residences and some institutional land uses such as schools and churches.

The Project Site is located in the Wilshire community plan area of Los Angeles, a mixed neighborhood with multi-family residences and commercial and retail uses. As a result, the sensitive receptors within 1,000 feet of the Project Site include but are not limited to the following representative sampling:

- Multi-family residences, 819-821 South Holt Avenue; five feet north of the Project site.
- Multi-family residences, 824-838 South Sherbourne Drive; 40 feet west of the Project site.

- Multi-family residences, 824 South Holt Avenue; 80 feet east of the Project site.
- Beverly Hills Tennis, 325 La Cienega Boulevard; 590 feet southeast of the Project site.
- Margaret Herrick Library, 333 La Cienega Blvd., 680 feet southeast of the Project site.
- La Cienega Park, 8400 Gregory Way, 700 feet east of the Project site.
- 250 La Cienega Medical Building; 960 feet northeast of the Project site.

(2) Existing Ambient Noise Levels

The Project Site is occupied by six multi-family units in three buildings totaling 10,617 square feet. Noise from these uses is dominated by auto travel to and from the project site and use surface-level parking spaces accessed off Holt Avenue. Some minor noise is generated by mechanical equipment, such as heating and cooling equipment, as well as occasional noise from refuse and recycling trucks serving the project site from Holt Avenue.

DKA Planning took short-term noise measurements near the Project site to determine the ambient noise conditions of the neighborhood near sensitive receptors (**Figure 1**).⁷ As shown in **Table 3**, noise levels along local roadways near the Project Site are consistent with those in suburban locations with modest traffic congestion. Specifically, noise levels are consistent with General Plan Noise Element guidelines for residential neighborhoods but are influenced by vehicle traffic on local streets or nearby arterials. Other noise sources are typical of residential neighborhoods (e.g., gardeners) and commercial streets (e.g., HVAC noise, construction).

Table 3
Existing Noise Levels

Noise Monitoring Locations	Sound Levels (dBA, L _{eq})
1. 821 South Holt Avenue	52.4
2. Margaret Herrick Library	65.9
3. La Cienega Park	71.4
4. 250 La Cienega Medical Building	68.8
5. Sherbourne Avenue	53.8
<i>Source: DKA Planning, 2021</i>	

⁷ Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.



3. Project Impacts

a) Methodology

(1) On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the maximum L_{max} source noise levels of the Project's potential construction equipment at a reference distance of 50 feet and comparing them to the 75 dBA at 50 feet standard set by Section 112.05 of the LAMC, as the Project is located within 500 feet of residential zones. Noise levels were then conservatively adjusted to account for standard, industry-wide best practice noise management techniques or features that would be employed during the Project's construction. The Project's potential to increase ambient noise levels at sensitive receptors by 5 dBA L_{eq} or more was also evaluated, pursuant to the L.A. CEQA Thresholds Guide recommendations.

Construction noise levels at nearby sensitive receptors were modeled pursuant to the ISO 9613-2 (1996) sound attenuation methodology using the SoundPLAN Essential model (version 5.1).

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:54 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 1 of 7.
(Please note: These files are in addition to the previous 20.)

This software package considers reference equipment noise levels, noise management techniques, distance to receptors, and any attenuating features to predict noise levels from sources like construction equipment. The distance from construction equipment noise sources (e.g., engines and tailpipes) assume that vehicles would not be capable of operating directly where the Project's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability, in addition to operating at reduced power and intensity to maintain precision at these locations.

(2) Off-Site Construction Activities – Haul Trucks

The Project's off-site construction noise impact from haul trucks was analyzed by considering the Project's estimated haul truck usage with existing traffic and roadway noise levels along the Project's anticipated haul route. Because it takes a doubling of traffic volumes on a roadway to generate the increased sound energy it takes to elevate ambient noise levels by 3 dBA, the analysis focused on whether truck traffic would double traffic volumes on key roadways to be used for hauling soils to and/or from the Project Site during construction activities. Because haul trucks have a larger roadway capacity than traditional passenger vehicles, a 2.0 passenger car equivalency (PCE) was used to convert haul truck trips to an equivalent number of passenger vehicles.⁸ It should be noted that because an official haul route has not been approved as of the preparation of this analysis, assumptions were made about logical routes that would minimize haul truck traffic on local streets in favor of major arterials that can access regional-serving freeways.

Similarly, off-site noise impacts from vendors and employees that access the construction site were also analyzed. The analysis focused on whether truck traffic would double traffic volumes on key roadways to be used for hauling soils during construction activities.

(3) On-Site Operational Noise Sources

The Project's potential to result in significant noise impacts from on-site operational noise sources was evaluated by identifying sources of on-site noise sources and considering the impact that they could produce given the nature of the source (i.e., loudness and whether noise would be produced during daytime or more-sensitive nighttime hours), distances to nearby sensitive receptors, surrounding ambient noise levels, the presence of similar noise sources in the vicinity, and maximum allowable noise levels permitted by the LAMC.

Noise generated by HVAC equipment was evaluated using typical maximum HVAC equipment noise levels. These noise levels were calculated at sensitive land use locations and compared to the City's noise standards for mechanical equipment and maximum allowable noise established by the State's modeled community noise ordinance. Incremental noise increases at nearby sensitive receptors were estimated using logarithmic methodologies that consider reference

⁸ Transportation Research Board, Transportation Circular No. 212 and Exhibit 12-25 of Highway Capacity manual, 6th Edition.

equipment noise levels, noise management techniques, distance to receptors, and any attenuating features. Noise impacts from the on-site parking garage were calculated using recommended worksheets from the Federal Transit Administration.⁹

(4) Off-Site Operational Project Traffic Noise Sources

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

b) Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to noise if the Project would result in:

- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;***
- b) Generation of excessive groundborne vibration or groundborne noise levels;***
- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airstrip, would the project expose people residing or working in the project area to excessive noise levels.***

(2) On-Site Construction Noise Threshold

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

- Construction noise would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way;

⁹ Federal Transit Administration, Noise Impact Assessment Spreadsheet, version 7/3/2007; 2007.

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

(3) Groundborne Vibration Thresholds

There are no adopted City standards or other applicable regulations that would govern the Project's vibration impacts. In assessing impacts related to noise and vibration in this section, the City will use Appendix G as the thresholds of significance. The criteria identified by the FTA in its 2006 Transit Noise and Vibration Impact Assessment manual will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

(4) Operational Noise Thresholds

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

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, as defined by the State's 2017 General Plan Guidelines (see **Table 2**).
- Project operations would cause any 5 dBA or greater noise increase.¹⁰

d) Analysis of Project Impacts

Threshold a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of

¹⁰ As a 3 dBA increase represents a slightly noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. In instances where the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase is still considered to be significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

(1) On-Site Construction Activities

Proposed construction would generate noise during the phases of construction that would span 18 months of grading, building construction, and application of architectural coatings. During all construction phases, noise-generating activities could occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. The Project would require heavy equipment (e.g., excavators, loaders, other earthmoving vehicles) during the grading and excavation of soils. Later in the construction of the building, smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized (**Table 4**). Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

**Table 4
Maximum Construction Noise Levels**

Noise Source	Noise Level (dBA, L _{max}) ¹
	Reference
Backhoe	80
Compactor	82
Crane	83
Dozer	85
Grader	85
Front End Loader	80
Paver	85
Roller	85
¹ Federal Transit Administration Noise and Vibration Manual, 2018.	

While **Table 4** summarizes maximum noise levels for each piece of equipment, actual noise levels would generally be lower for three key reasons. First, equipment does not always operate at in a steady-state mode full load, but rather powers up and down depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during the when no noise is generated by that equipment. Third, during the grading phase, as construction activities descend below grade, adjacent land uses sensitive to noise are increasingly shielded from noise from construction equipment.

Regardless of the construction activity, compliance with LAMC Section 112.05 would limit noise levels from powered construction equipment to 75 dBA or below at 50 feet, as the Project Site is within 500 feet of residential zones. This is generally met by using newer, quieter equipment with more effective mufflers to dampen noise from internal combustion engines and warming-up or

825 Holt Avenue

Signs and symbols

- Wall
- Calculation area
- Construction Site

Levels in dB(A)

< 25
25 - 30
30 - 35
35 - 40
40 - 45
45 - 50
50 - 55
55 - 60
60 - 65
65 - 70
70 - 75
75 - 80
80 - 85
>= 85

1 : 175

0 45 90 180 270 360 feet

DOUGLAS KIM + ASSOCIATES, LLC

City of Los Angeles
November 2021

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:55 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 2 of 7.
(Please note: These files are in addition to the previous 20.)

Table 5
Construction Noise Impacts at Off-Site Sensitive Receptors (without Mitigation)

Building	Maximum Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase	Significant?
1. 821 South Holt Avenue	54.3	52.4	56.5	4.1	No
2. Margaret Herrick Library	37.0	65.9	65.9	0.0	No
3. La Cienega Park	36.8	71.4	71.4	0.0	No
4. 250 La Cienega Medical Building	30.8	68.8	68.8	0.0	No
5. Sherbourne Avenue	54.0	53.8	56.9	3.1	No
Source: DKA Planning 2021					

(2) Off-Site Construction Activities – Haul Trucks

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require about 1,422 haul trips to export soils to off-site landfills. While a haul route has not been approved, haul trucks would likely use La Cienega Boulevard southbound to access the west- or eastbound lanes of the Santa Monica Freeway (I-10).

According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. The grading phase would average approximately nine haul trucks per hour over an eight-hour day that would travel along La Cienega Boulevard and then accessing freeways to reach landfill locations. A doubling of traffic volumes is required to increase ambient noise levels by 3 dBA. The marginal addition of about eight haul trucks per hour to local arterials would represent the equivalent of about 16 passenger vehicles, less than 0.5 percent of traffic volumes on arterials like La Cienega Boulevard that experience about 3,393 hourly trips at Olympic Boulevard in the morning peak hour and 3,563 hourly trips in the afternoon peak hour.¹¹ As a result, haul trucks would not double traffic volumes that would be needed to increase ambient noise levels by 3 dBA. As a result, the Project's off-site construction noise impact from haul trucks would be considered less than significant.

(3) On-Site Operational Noise Sources

¹¹ City of Los Angeles, 24 Hours Traffic Volume data for La Cienega at Olympic.
<http://navigatela.lacity.org/print/temp/54F70CC2-D3A3-3ED6-D8CFAB35DED40B3D.pdf?CFID=43811413&CFTOKEN=81ea35e6dc7727fd-54EF4EF3-D3A3-3ED6-DD755AEC7C047EF3>

During operations, the Project would produce noise from both on- and off-site sources. As discussed below, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The Project would also not increase surrounding noise levels by more than 3 dBA CNEL, the minimum threshold of significance adopted by this analysis. As a result, the Project's on-site operational noise impacts would be considered **less than significant**.

Mechanical Equipment. HVAC equipment would be located on building rooftops, where equipment generates a sound pressure level of up to 95 dBA at one foot. The roof edge and a 4'5" high parapet create a natural noise barrier that reduces noise levels from rooftop HVAC units by 8 dBA or more. This is helpful in managing noise, as equipment often operates continuously throughout the day, evening, and night. Noise levels at nearby receptors from HVAC equipment placed at the edges of the roof of the Project Site would marginally increase noise at off-site receptors and generally be inaudible to all receptors. This assumes both attenuation from both the roof edge for HVAC equipment.

Auto-Related Activities. The Project would include a two-level subterranean garage, of which the lower Level B1 would accommodate the Project's 36 parking spaces. Cars would enter and exit the Project Site from Holt Avenue which faces east, approximately 90 feet from apartment buildings across Holt Avenue. Noise levels associated with the subterranean parking levels (e.g., tire squeal, slamming vehicle doors) would be contained within the parking structure, as the subterranean parking levels would be fully enclosed on all sides. As illustrated in **Table 6**, auto-related noise from the parking garage would increase ambient noise levels by less than one dBA, inaudible to residents of the nearest receptors to the east. As such, noise impacts from parking operations would be less than significant.

Table 6
Parking Garage-Related Impacts at Off-Site Sensitive Receptors

Building	Maximum Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase	Significant?
835-836 Holt Avenue	41.1	52.4	53.0	<1.0	No

Source: DKA Planning 2020 using FTA Noise Impact Assessment Spreadsheet

Residential Uses. Noise associated with the 112-bed facility would include a variety of sources, including human conversation and activities, trash collection, landscape maintenance, and commercial loading operations. These are discussed below:

- Human conversation and activities. Noise associated with everyday human activities would largely be contained internally within the Project, such as an Activities/Open Lounge area on the Level B1, a subterranean level completely enclosed within the development. Noise

associated with outdoor residential activities could include passive activities such as human conversation and socializing on any of the proposed outdoor spaces and uses:

- Courtyard on Level B1 outside the Activities/Open Lounge
- Dining Courtyard on Level 1, set back 15 feet from the rear property line.
- Three roof decks on Level 5, set back 15 feet or more from the rear property line

These outdoor spaces represent gathering places for outdoor activities that are both private and group oriented. These would be intermittent activities that would produce negligible impacts from human speech, based in large part on the Lombard effect. This phenomenon recognizes that voice noise levels in face-to-face conversations generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of one meter. Specifically, vocal intensity increases about 0.38 dB for every 1.0 dB increase in noise levels above 55 dB, meaning people talk slightly above ambient noise levels in order to communicate.¹² Assuming an ambient noise level as low as 52.4 dBA L_{eq} along Holt Avenue, human conversations from rooftop activities could generate about 52 dB of noise at one meter (i.e., 3.2 feet).

While the noise levels from rooftop and courtyard activities would be marginal, the attenuation from the built environment would virtually eliminate any exposure to elevated noise levels at the nearest sensitive receptors. Noise from speech and conversation generally does not exceed approximately 65 dBA at a reference distance of one meter. These noises attenuate rapidly and would not be capable of elevating surrounding ambient noise levels by more than a nominal degree. The dining courtyard would be located within the Project, shielded on three sides by the development, with the opening facing west toward the rear of multi-family residences on Sherbourne Drive. However, the courtyard would be set back 15 feet from the shared property line, helping attenuate any sound from these passive outdoor spaces. Further, garages on the adjacent properties would further shield sensitive receptors from any substantial noise exposure. As for the roof-top decks, they would also be shielded on three sides by the 5th floor residences, with the opening facing west. These decks would also be set back 15 feet or more from the shared property line to the south. In addition, a 4'5" high parapet on the roof deck would block any line-of-sight from residents and guests conversing on the rooftop to off-site receptors. As a result, the increase in ambient noise levels at nearby receptors would be negligible for sensitive receptors.

- Landscape maintenance. Noise from gas-powered leaf blowers, lawnmowers, and other landscape equipment can generate substantial bursts of noise during regular maintenance. For example, gas powered leaf blowers and other equipment with two-stroke engines can

¹² Acoustical Society of America, Volume 134; Evidence that the Lombard effect is frequency-specific in humans, Stowe and Golob, July 2013.

generated 100 dBA L_{eq} and cause nuisance or potential noise impacts for nearby receptors.¹³ However, given the limited landscape plan for the Proposed Project, such equipment is not expected to be used substantially in exterior spaces. As such, any intermittent landscape equipment would operate during the day and represent a negligible impact and ultimately be subject to compliance with LAMC Section 112.05 governing powered equipment and hand tools, LAMC Section 112.06 regulating amplified equipment in a place of public entertainment, and other nuisance regulations.

- Trash collection. On-site trash and recyclable materials would be managed and picked-up on Level B2, where trash and recycling trucks would access these facilities from Holt Avenue. Solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.¹⁴ These activities would entirely within an enclosed underground garage and would not impact sensitive receptors. LAMC Section 113.01 also regulates noise from garbage collection and disposal.
- Commercial loading. On-site loading and unloading activities would be managed on the Level B2, where trucks would access these facilities Holt Avenue. This area is shielded by the development in all directions and would have no direct line-of-sight to off-site receptors. As a result, there would be negligible noise impacts on off-site receptors. Section 114.03 prohibits loading and unloading causing any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between the hours of 10 P.M. and 7 A.M.

Based on an assessment of these on-site sources, the impact of on-site operational noise sources would be considered **less than significant**.

(4) Off-Site Operational Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily vehicle trips. On a typical weekday, the Project is forecast to generate an estimated 218 net new daily trips, including 20 net new A.M. peak hour trips and 23 net new P.M. peak hour trips.¹⁵

Project-related traffic would have a negligible impact on roadside ambient noise levels in the Project vicinity. The marginal addition of up to 23 net new vehicles per hour to local arterials would represent less than 0.5 percent of traffic volumes on arterials like La Cienega Boulevard that experience about 3,393 hourly trips at Olympic Boulevard in the morning peak hour and 3,563

¹³ Erica Walker et al, Harvard School of Public Health; Characteristics of Lawn and Garden Equipment Sound; 2017

¹⁴ RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003

¹⁵ DKA Planning 2020 using CalEEMod 2016.3.2 and Institute of Transportation Engineers Trip Generation Manual (10th Edition) time of day distribution for Assisted Living facilities (Land Use 254).

hourly trips in the afternoon peak hour.¹⁶ This is far less than the 100 percent increase in traffic volumes needed to increase ambient noise levels by 3 dBA L_{eq} . As such, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four hour CNEL impacts would similarly be minimal, far below the Thresholds Guide criteria for significant operational noise impacts, which begin at 3 dBA. As such, this impact would be considered **less than significant**.

Cumulative Impacts

Construction

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

There is a potential development approximately 240 feet southwest of the Project Site at 847 South Sherbourne Drive that could generate construction noise concurrent with the Proposed Project. That project could remove 12 existing residences and construct eight memory care units and 48 assisted living units. When combined with existing ambient noise levels, concurrent construction noise from these two projects was modeled assuming the highest noise generating uses during construction of the two projects would occur simultaneously, the results of which demonstrated that the combined effect of the two projects would not substantially elevate ambient noise levels by 5 dBA L_{eq} or more, the results of which are presented below in **Table 7**. Therefore, this related project's remaining construction activities would not result in cumulatively considerable on-site noise impacts with the proposed Project.

Construction-related noise levels from this or any other related projects would be intermittent and temporary, and it is anticipated that, as with the Project, any related projects would comply with the LAMC's restrictions, including construction hours and noise from powered equipment. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Based on this, there would not

¹⁶ City of Los Angeles, 24 Hours Traffic Volume data for La Cienega at Olympic.
<http://navigatela.lacity.org/print/temp/54F70CC2-D3A3-3ED6-D8CFAB35DED40B3D.pdf?CFID=43811413&CFTOKEN=81ea35e6dc7727fd-54EF4EF3-D3A3-3ED6-DD755AEC7C047EF3>

be cumulative noise impacts at any nearby sensitive uses located near the Project Site and related projects in the event of concurrent construction activities.

Table 7
Cumulative Construction Noise Impacts at Off-Site Sensitive Receptors (without Mitigation)

Building	Maximum Construction Noise Level (dBA L _{eq})	Existing Ambient Noise Level (dBA L _{eq})	New Ambient Noise Level (dBA L _{eq})	Increase	Significant?
1. 821 South Holt Avenue	54.3	52.4	56.5	4.1	No
2. Margaret Herrick Library	37.0	65.9	65.9	0.0	No
3. La Cienega Park	36.8	71.4	71.4	0.0	No
4. 250 La Cienega Medical Building	30.8	68.8	68.8	0.0	No
5. Sherbourne Avenue	54.0	53.8	56.9	3.1	No
Source: DKA Planning 2021					

As such, there would not be a significant cumulative noise impact at any nearby sensitive receptors located near the Project Site and related projects in the event of concurrent construction activities.

Off-Site Construction Noise

Haul trucks would have a potential to result in cumulative impacts to off-site noise levels if the haul trucks, vendor trucks, or worker trips for the related project on Sherbourne Drive were to utilize the same routes. These two cumulative developments would not more than double traffic volumes on existing streets, which would be necessary to increase ambient noise levels by 3 dBA. For example, cumulative truck and vehicle travel on Olympic Boulevard would have to double the existing 3,808 vehicles on La Cienega Boulevard at Olympic Boulevard in the A.M. peak hour or 3,101 trips during the P.M. peak hour just to increase ambient noise levels by 3 dBA L_{eq}.¹⁷ The Proposed Project and related project would generate a minimal amount of traffic on La Cienega and other local streets in the area. Therefore, cumulative noise due to construction truck traffic from the Project and related projects do not have the potential to exceed the ambient noise levels along the haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be less than significant.

Operation

The Project Site and surrounding neighborhood have been developed with residential and commercial uses that have previously generated, and will continue to generate, noise from a number of operational noise sources, including mechanical equipment (e.g., HVAC systems),

¹⁷ Los Angeles Department of Transportation. Manual Traffic Count Summary, 2018.
https://navigatela.lacity.org/dot/traffic_data/automatic_counts/OLYMPIC.LACIENEGA.180417-AUTO.pdf

outdoor activity areas, and vehicle travel. Similar to the Project, any related projects in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. Given the commercial zoning of La Cienega and Olympic Boulevards, any related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

On-Site Stationary Noise Sources

Noise from on-site mechanical equipment (e.g., HVAC units) and any other human activities from related projects would not be typically associated with excessive noise generation that could result in increases of 5 dBA or more in ambient noise levels at sensitive receptors when combined with operational noise from the Proposed Project. Given the residential and commercial zoning in the vicinity of the Project Site, no substantial sources of operational noise (e.g., heavy-duty diesel equipment) are expected to generate any meaningful long-term noise. Therefore, cumulative stationary source noise impacts associated with operation of the Project and related projects would be less than significant.

Off-Site Mobile Noise Sources

The Project and any related projects within 1,000 feet of the Project Site would produce traffic volumes (off-site mobile sources) that would generate roadway noise. On a typical weekday, the Project would generate 315 average daily vehicle trips.¹⁸ The related project on Sherbourne Drive would generate an additional 55 daily vehicle trips. These increases represent no more than one percent of traffic on La Cienega or Olympic Boulevards. Because it takes a doubling of traffic volumes to increase ambient noise levels by 3 dBA L_{eq} , neither the Project's traffic impact nor cumulative traffic impacts would not increase ambient noise levels on these roads. Therefore, cumulative noise impacts due to off-site traffic noise would be less than significant.

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

Threshold b) Generation of excessive groundborne vibration or groundborne noise levels?

¹⁸ DKA Planning 2020 based on the CalEEMod model using ITE Trip Generation Manual (9th Edition) factors.

(1) Building Damage Vibration Impact – On-Site Sources

As discussed earlier, construction of the Project would require large steel-tracked earthmoving equipment such as excavators. Though these vehicles may be capable of generating maximum vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet, it is important to note that these vehicles would not be capable of operating directly where the Project's property line abuts adjacent structures. These vehicles would retain some setback to preserve maneuverability and operate at reduced power and intensity to maintain precision.

As a result, vibration levels of 0.089 inches per second PPV, representative of maximum, peak operations, would not be generated at the property lines of the Project. Smaller, more maneuverable and precise equipment and techniques capable of fine grading at property lines would generate maximum vibration levels of 0.001 inches per second PPV. **Table 8** shows the Project's estimated construction vibration impacts at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration as a result of the Project's construction activities, and more distance structures would experience lesser impacts. Therefore, the Project's vibration impacts as generated by on-site construction activities would be considered **less than significant**.

Table 8
Building Damage Vibration Levels – On-Site Sources

Building	Distance (feet) ¹	Condition ²	Significance Criteria (in/sec) ¹	Estimated Maximum Vibration Velocity (in/sec PPV)	Significant Impact?
Large Dozer-Type Equipment					
821 Holt Avenue residences	15	III. Non-engineered timber and masonry	0.2	0.148	No
839 Holt Avenue residences	15	III. Non-engineered timber and masonry	0.2	0.148	No
Small Dozer-Type Equipment					
821 Holt Avenue residences	15	III. Non-engineered timber and masonry	0.2	0.001	No
839 Holt Avenue residences	15	III. Non-engineered timber and masonry	0.2	0.000	No
¹ Includes 10 feet of setback for maneuverability of construction equipment ² Structural condition and significance criteria based on FTA guidelines issued in the 2018 FTA Transit Noise and Vibration Impact Assessment manual. Source: DKA Planning, 2020					

(2) Building Damage Vibration Impact – Off-Site Sources

With regard to off-site construction-related noise impacts, Section 112.05 of the LAMC does not regulate noise levels from road legal trucks, such as delivery vehicles, concrete mixing trucks, pumping trucks, and haul trucks. However, the operation of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC. The Project is expected to require haul trips to export soils to off-site landfills. While a haul route has not been approved, haul trucks would likely use La Cienega Boulevard southbound to access the west- or eastbound lanes of the Santa Monica Freeway (I-10), bypassing local collector roads. Haul trucks would generate occasional noise events at receptors during passbys, but such intermittent noise events would have a limited effect on surrounding ambient noise levels on La Cienega Boulevard. As a result, the Project's off-site construction noise impact from haul trucks would be consistent with the Municipal Code.

As discussed earlier, construction of the Project would generate trips from large trucks including haul trucks, concrete mixing trucks, concrete pumping trucks, and vendor delivery trucks. Regarding building damage, based on FTA data, the vibration generated by a typical heavy-duty truck would be approximately 63 VdB (0.006 PPV) at a distance of 50 feet from the truck.¹⁹ According to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated approximately 25 feet from the right-of-way and would be exposed to ground-borne vibration levels of approximately 0.006 PPV. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) would be well below the most stringent building damage criteria of 0.12 PPV for buildings extremely susceptible to vibration. The Project's potential to damage roadside buildings and structures as the result of groundborne vibrations generated by its truck trips would be considered less than significant.

(2) Operational Vibration Sources

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's long-term vibration impact from operational sources (primarily passenger vehicles) would be nominal and **less than significant**.

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

¹⁹ Federal Transit Administration, “Transit Noise and Vibration Impact Assessment,” May 2006, Figure 7-3.

The Project site is not located within the vicinity of a private airstrip or an airport land use plan, nor is it located within two miles of a public airport or public use airstrip. As a result, this criterion is not applicable to this Project, which would have **no impact** on exposing people residing or working in the project area to excessive noise levels.

e) Mitigation Measures

None required.

TECHNICAL APPENDIX

NOISE MONITORING

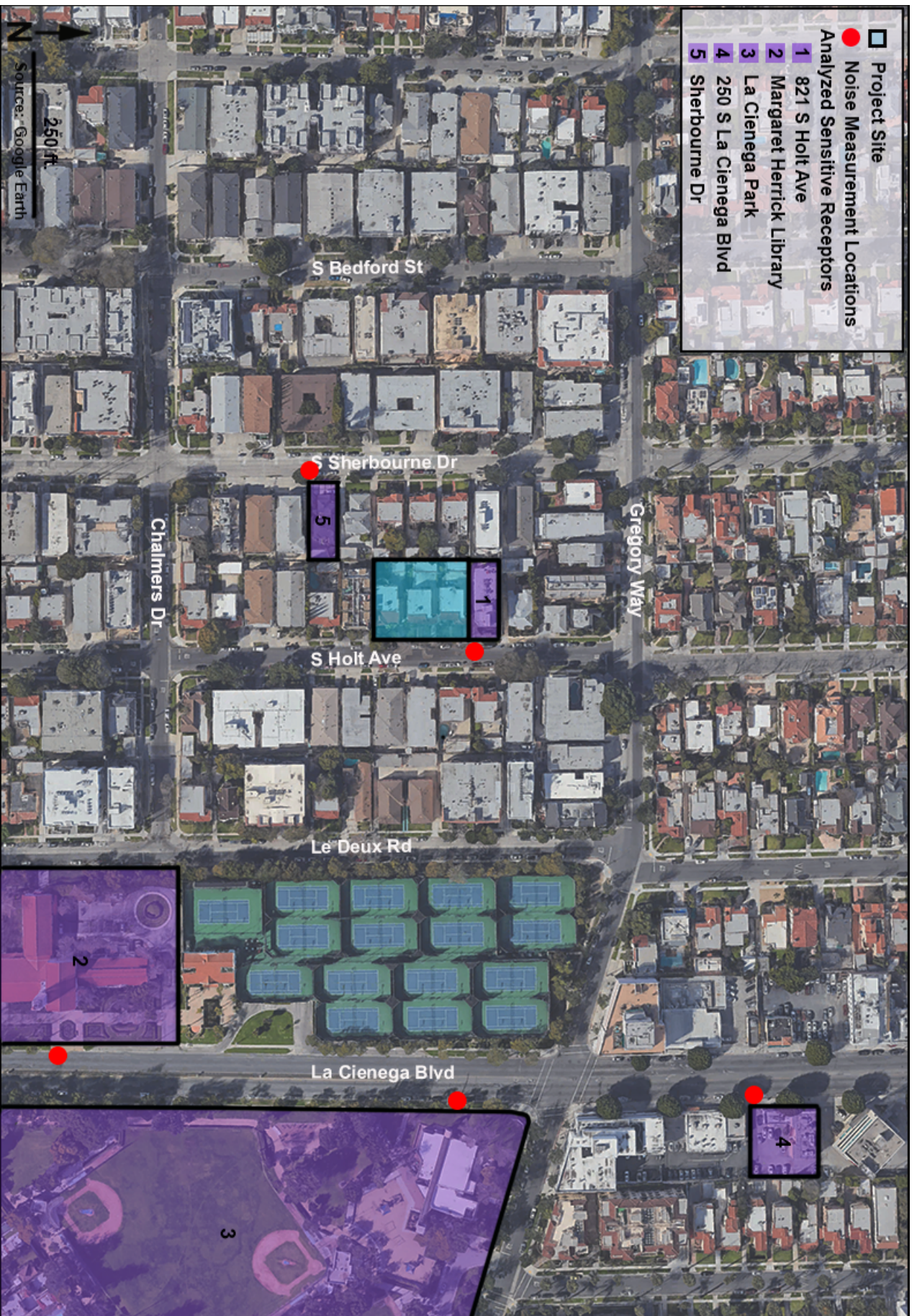


Figure 1
Noise Measurement Locations



DOUGLASKIM+ASSOCIATES, LLC

825 South Holt Avenue

Noise Monitoring Location #1

Information Panel

Name	S005_BIJ050019_18032020_202738
Start Time	3/17/2020 12:46:58 PM
Stop Time	3/17/2020 1:01:58 PM
Device Name	BIJ050019
Model Type	SoundPro DL
Device Firmware Rev	R.13H
Comments	

Summary Data Panel

<u>Description</u>	<u>Meter</u>	<u>Value</u>	<u>Description</u>	<u>Meter</u>	<u>Value</u>
Leq	1	52.4 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	1/1
Exchange Rate	2	3 dB	Weighting	2	C
Response	2	FAST			

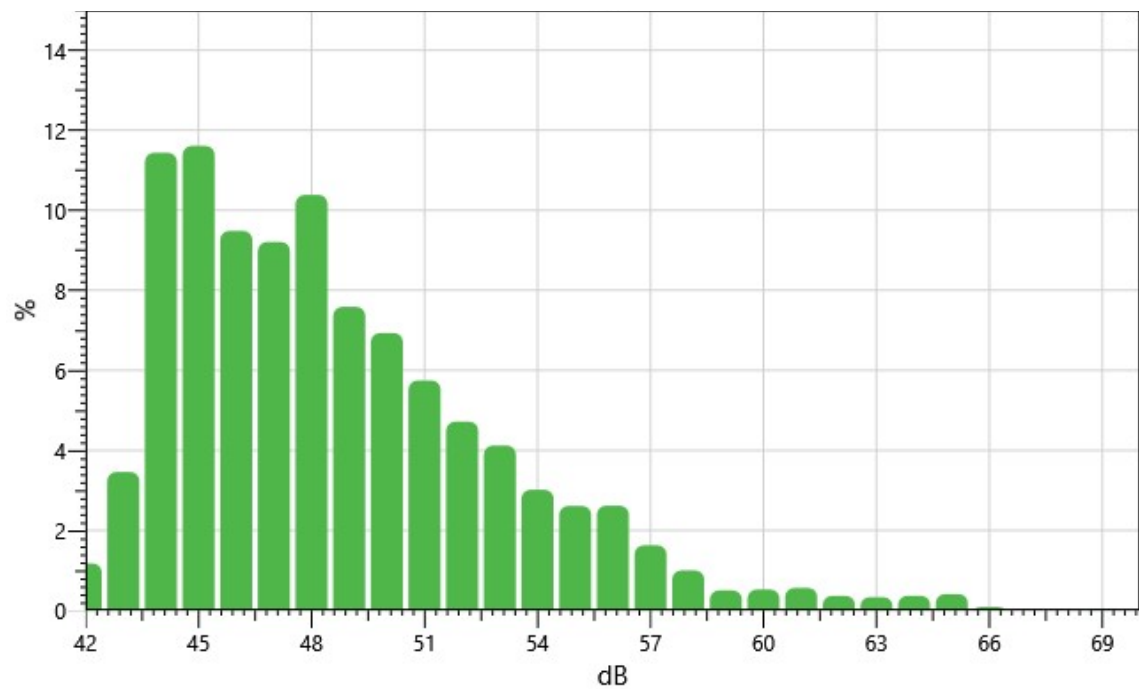
Statistics Table

dB:	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
42:	0.02	0.04	0.02	0.07	0.14	0.11	0.18	0.15	0.18	0.26	1.18
43:	0.17	0.14	0.18	0.06	0.37	0.43	0.50	0.43	0.60	0.57	3.46
44:	0.77	0.80	1.12	1.05	1.01	1.21	1.32	1.41	1.39	1.35	11.44
45:	1.28	1.30	1.07	1.26	1.05	1.09	1.19	1.25	1.18	0.93	11.61
46:	1.03	1.12	1.23	0.55	0.97	0.92	0.92	0.89	0.93	0.91	9.48
47:	0.92	0.86	0.94	1.00	0.85	0.87	0.84	0.95	0.99	0.99	9.21
48:	1.15	1.25	1.06	1.15	0.94	0.96	0.94	1.03	1.02	0.88	10.38
49:	0.86	0.85	1.02	0.48	0.71	0.74	0.74	0.71	0.71	0.75	7.59
50:	0.74	0.70	0.79	0.79	0.72	0.72	0.69	0.60	0.59	0.58	6.93
51:	0.69	0.65	0.59	0.52	0.62	0.64	0.55	0.55	0.44	0.48	5.75
52:	0.57	0.59	0.59	0.34	0.39	0.47	0.47	0.45	0.41	0.44	4.72
53:	0.44	0.41	0.44	0.40	0.41	0.43	0.47	0.31	0.36	0.45	4.12
54:	0.41	0.29	0.35	0.32	0.30	0.27	0.27	0.26	0.28	0.28	3.02
55:	0.29	0.29	0.33	0.25	0.19	0.26	0.23	0.22	0.27	0.28	2.61

56:	0.33	0.30	0.27	0.27	0.22	0.26	0.30	0.26	0.19	0.20	2.62
57:	0.21	0.20	0.16	0.16	0.18	0.19	0.18	0.11	0.15	0.09	1.63
58:	0.14	0.14	0.12	0.07	0.06	0.09	0.09	0.11	0.09	0.08	1.00
59:	0.07	0.06	0.06	0.05	0.05	0.04	0.04	0.04	0.05	0.05	0.50
60:	0.05	0.06	0.05	0.06	0.05	0.07	0.05	0.05	0.05	0.04	0.52
61:	0.06	0.09	0.09	0.07	0.03	0.06	0.05	0.05	0.04	0.04	0.56
62:	0.04	0.04	0.03	0.03	0.03	0.04	0.04	0.03	0.04	0.04	0.37
63:	0.04	0.06	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.03	0.34
64:	0.05	0.03	0.05	0.04	0.01	0.03	0.04	0.04	0.05	0.05	0.37
65:	0.05	0.06	0.06	0.04	0.05	0.04	0.02	0.02	0.05	0.03	0.41
66:	0.03	0.02	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.09
67:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
68:	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.03
69:	0.01	0.01	0.01	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.04

Statistics Chart

S005_BIJ050019_18032020_202738: Statistics Chart



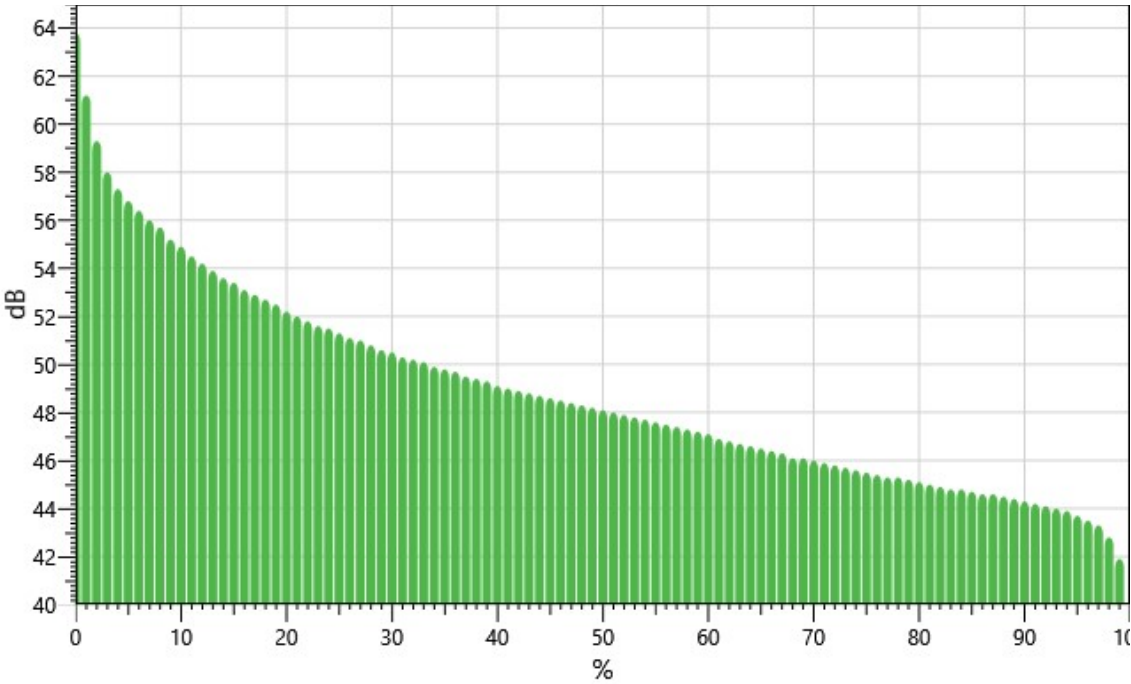
Exceedance Table

.	0%	1%	2%	3%	4%	5%	6%	%7	%8	%9
0%:		63.8	61.2	59.3	58.0	57.3	56.8	56.4	56.0	55.7

10%:	55.2	54.9	54.5	54.2	53.9	53.6	53.4	53.1	52.9	52.7
20%:	52.5	52.2	52.0	51.8	51.6	51.5	51.3	51.1	51.0	50.8
30%:	50.6	50.5	50.3	50.2	50.1	49.9	49.8	49.7	49.5	49.4
40%:	49.3	49.1	49.0	48.9	48.8	48.7	48.6	48.5	48.4	48.3
50%:	48.2	48.1	48.0	47.9	47.8	47.7	47.6	47.5	47.4	47.3
60%:	47.2	47.1	46.9	46.8	46.7	46.6	46.5	46.4	46.3	46.1
70%:	46.1	46.0	45.9	45.8	45.7	45.6	45.5	45.4	45.3	45.3
80%:	45.2	45.1	45.0	44.9	44.8	44.8	44.7	44.6	44.6	44.5
90%:	44.4	44.3	44.2	44.1	44.0	43.9	43.7	43.5	43.3	42.8
100%:	41.9									

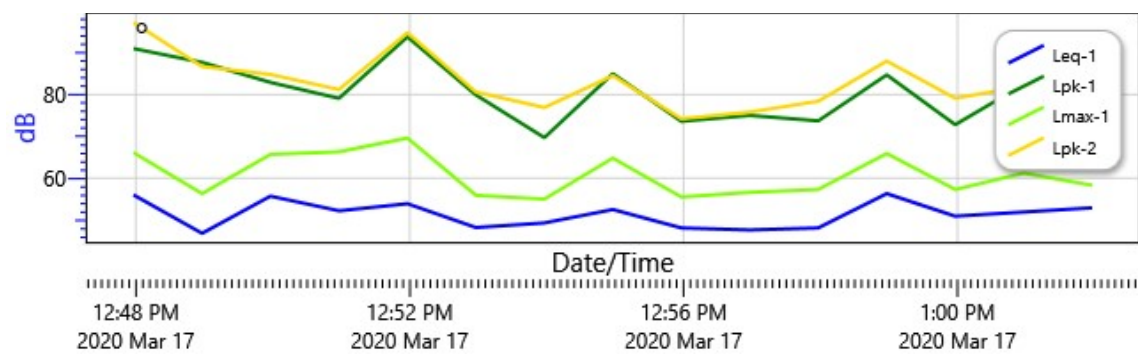
Exceedance Chart

S005_BII050019_18032020_202738: Exceedance Chart



Logged Data Chart

S005_BIJ050019_18032020_202738: Logged Data Chart



Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:56 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 3 of 7.
(Please note: These files are in addition to the previous 20.)

825 South Holt Avenue

Noise Monitoring Location #2

Information Panel

Name	S006_BIJ050019_18032020_202740
Start Time	3/17/2020 1:26:24 PM
Stop Time	3/17/2020 1:41:24 PM
Device Name	BIJ050019
Model Type	SoundPro DL
Device Firmware Rev	R.13H
Comments	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	65.9 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	1/1
Exchange Rate	2	3 dB	Weighting	2	C
Response	2	FAST			

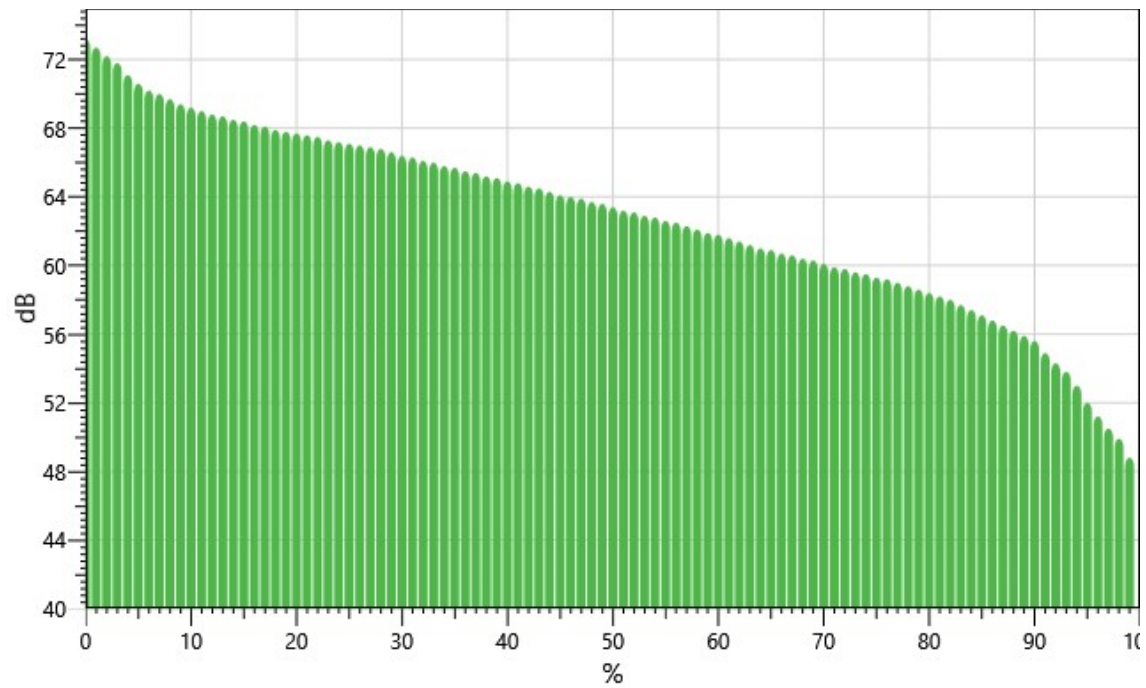
Statistics Table

dB:	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
48:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
49:	0.02	0.05	0.05	0.02	0.01	0.09	0.13	0.16	0.16	0.20	0.89
50:	0.23	0.21	0.20	0.20	0.09	0.13	0.21	0.18	0.13	0.09	1.68
51:	0.10	0.17	0.11	0.09	0.12	0.08	0.11	0.11	0.27	0.11	1.25
52:	0.08	0.11	0.10	0.06	0.05	0.11	0.20	0.11	0.10	0.07	0.98
53:	0.07	0.12	0.15	0.12	0.15	0.18	0.13	0.11	0.11	0.16	1.30
54:	0.11	0.07	0.14	0.27	0.31	0.20	0.17	0.25	0.18	0.13	1.83
55:	0.12	0.14	0.13	0.10	0.07	0.15	0.23	0.28	0.28	0.37	1.88
56:	0.41	0.30	0.32	0.26	0.41	0.40	0.38	0.42	0.27	0.23	3.41
57:	0.35	0.28	0.34	0.29	0.26	0.31	0.31	0.34	0.35	0.41	3.24
58:	0.40	0.43	0.69	0.45	0.28	0.40	0.50	0.47	0.60	0.48	4.69
59:	0.56	0.73	0.56	0.56	0.60	0.65	0.68	0.64	0.69	0.76	6.42
60:	0.64	0.53	0.59	0.56	0.57	0.65	0.60	0.73	0.71	0.65	6.23
61:	0.72	0.75	0.50	0.64	0.27	0.55	0.47	0.61	0.51	0.57	5.58

[illegible]

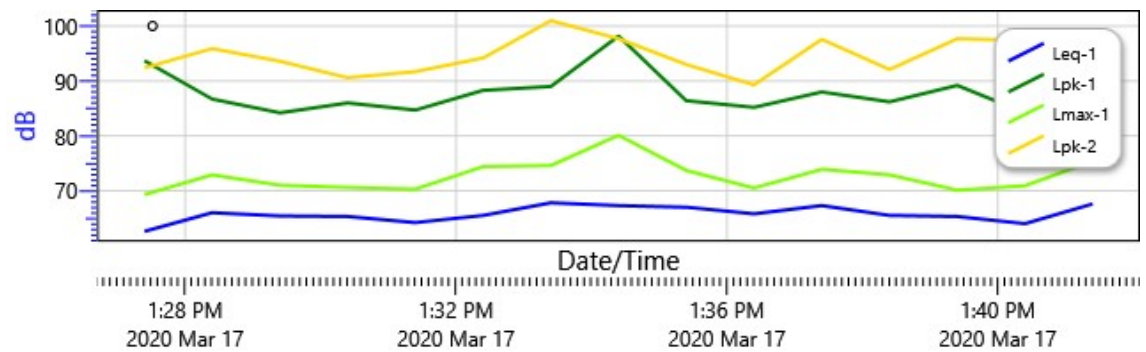
Exceedance Chart

S006_BIJ050019_18032020_202740: Exceedance Chart



Logged Data Chart

S006_BIJ050019_18032020_202740: Logged Data Chart



825 South Holt Avenue

Noise Monitoring Location #3

Information Panel

Name	S007_BIJ050019_18032020_202742
Start Time	3/17/2020 1:44:07 PM
Stop Time	3/17/2020 1:59:07 PM
Device Name	BIJ050019
Model Type	SoundPro DL
Device Firmware Rev	R.13H
Comments	

Summary Data Panel

<u>Description</u>	<u>Meter</u>	<u>Value</u>	<u>Description</u>	<u>Meter</u>	<u>Value</u>
Leq	1	71.4 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	1/1
Exchange Rate	2	3 dB	Weighting	2	C
Response	2	FAST			

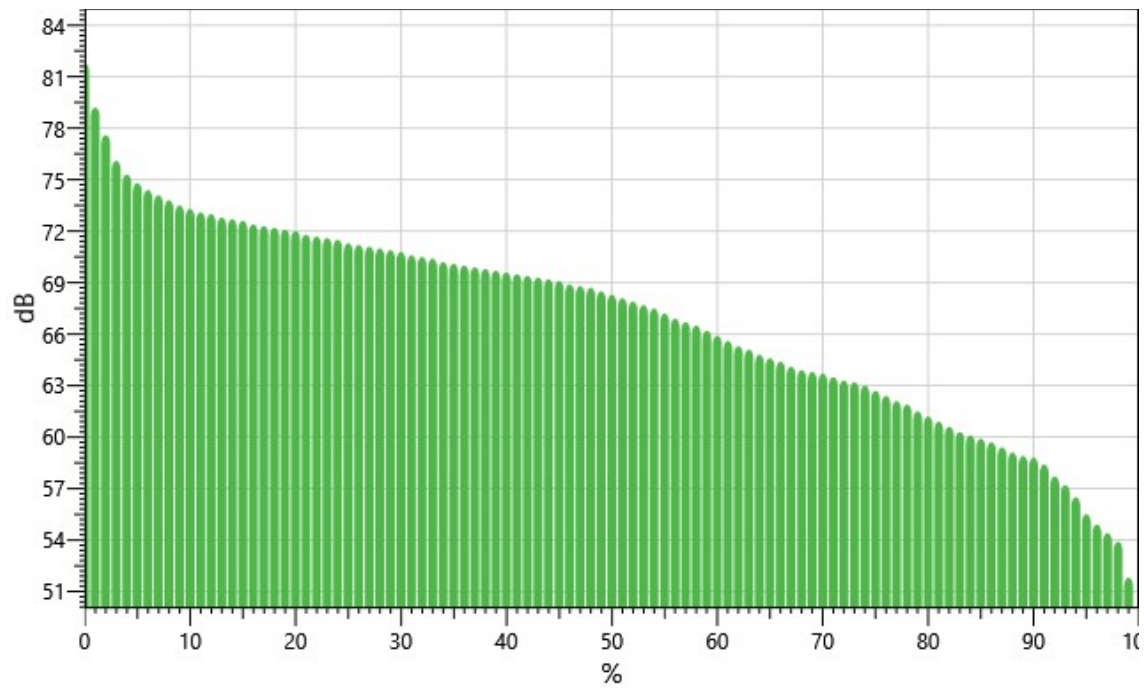
Statistics Table

dB:	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
51:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01
52:	0.01	0.01	0.01	0.01	0.01	0.03	0.01	0.03	0.03	0.02	0.18
53:	0.02	0.01	0.04	0.05	0.12	0.06	0.07	0.11	0.14	0.15	0.77
54:	0.21	0.19	0.22	0.11	0.22	0.21	0.27	0.16	0.19	0.13	1.92
55:	0.24	0.20	0.15	0.11	0.14	0.18	0.16	0.14	0.13	0.11	1.56
56:	0.08	0.09	0.09	0.08	0.07	0.09	0.09	0.15	0.18	0.13	1.05
57:	0.10	0.17	0.13	0.12	0.22	0.17	0.32	0.24	0.14	0.11	1.72
58:	0.12	0.14	0.15	0.14	0.13	0.21	0.18	0.18	0.22	0.68	2.15
59:	0.64	0.53	0.57	0.30	0.40	0.30	0.31	0.45	0.54	0.48	4.51
60:	0.45	0.43	0.42	0.51	0.58	0.39	0.30	0.32	0.35	0.32	4.06
61:	0.40	0.30	0.36	0.34	0.14	0.31	0.31	0.28	0.33	0.28	3.04
62:	0.31	0.38	0.35	0.29	0.39	0.40	0.38	0.40	0.36	0.34	3.60
63:	0.35	0.36	0.42	0.72	0.64	0.64	0.56	0.55	0.85	0.68	5.77
64:	0.72	0.76	0.47	0.47	0.16	0.45	0.36	0.46	0.52	0.53	4.89

65:	0.37	0.36	0.39	0.56	0.36	0.34	0.27	0.33	0.29	0.28	3.55
66:	0.32	0.32	0.31	0.30	0.34	0.45	0.47	0.43	0.51	0.43	3.88
67:	0.48	0.44	0.39	0.36	0.10	0.34	0.35	0.46	0.49	0.51	3.92
68:	0.47	0.59	0.55	0.50	0.49	0.46	0.54	0.78	0.76	0.69	5.82
69:	0.68	0.69	0.75	0.89	0.89	0.94	1.01	0.97	1.13	1.18	9.13
70:	1.09	0.99	0.93	0.86	0.28	0.90	0.75	0.74	0.77	1.03	8.33
71:	0.88	0.85	0.78	0.78	0.93	0.91	0.88	0.77	0.72	0.84	8.33
72:	0.79	0.81	0.88	0.88	0.89	0.84	0.68	0.66	0.70	0.73	7.87
73:	0.75	0.74	0.78	0.67	0.20	0.51	0.41	0.41	0.39	0.41	5.28
74:	0.36	0.30	0.33	0.38	0.25	0.28	0.25	0.27	0.20	0.19	2.80
75:	0.23	0.22	0.22	0.13	0.19	0.17	0.10	0.12	0.12	0.11	1.62
76:	0.11	0.11	0.09	0.10	0.04	0.07	0.07	0.06	0.06	0.05	0.76
77:	0.07	0.07	0.06	0.05	0.07	0.07	0.07	0.07	0.11	0.07	0.70
78:	0.05	0.05	0.06	0.07	0.05	0.06	0.06	0.10	0.07	0.07	0.64
79:	0.05	0.05	0.05	0.05	0.02	0.04	0.04	0.05	0.04	0.05	0.44
80:	0.06	0.05	0.06	0.09	0.04	0.06	0.05	0.06	0.05	0.02	0.53
81:	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.18
82:	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.20
83:	0.02	0.02	0.02	0.01	0.05	0.03	0.02	0.03	0.02	0.01	0.24
84:	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.09
85:	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.01	0.01	0.11
86:	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.03	0.16
87:	0.02	0.04	0.03	0.03	0.04	0.03	0.01	0.01	0.00	0.00	0.20

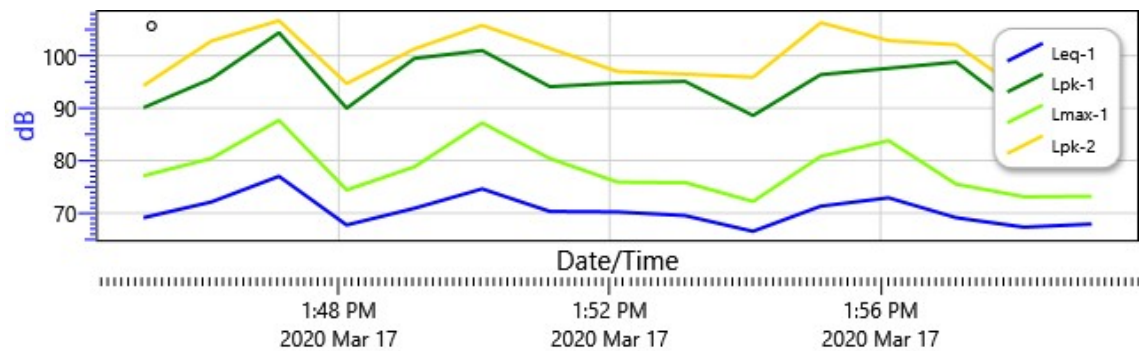
Exceedance Chart

S007_BIJ050019_18032020_202742: Exceedance Chart



Logged Data Chart

S007_BIJ050019_18032020_202742: Logged Data Chart



825 South Holt Avenue

Noise Monitoring Location #4

Information Panel

Name	S008_BIJ050019_18032020_202744
Start Time	3/17/2020 2:03:46 PM
Stop Time	3/17/2020 2:18:46 PM
Device Name	BIJ050019
Model Type	SoundPro DL
Device Firmware Rev	R.13H
Comments	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	68.8 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	1/1
Exchange Rate	2	3 dB	Weighting	2	C
Response	2	FAST			

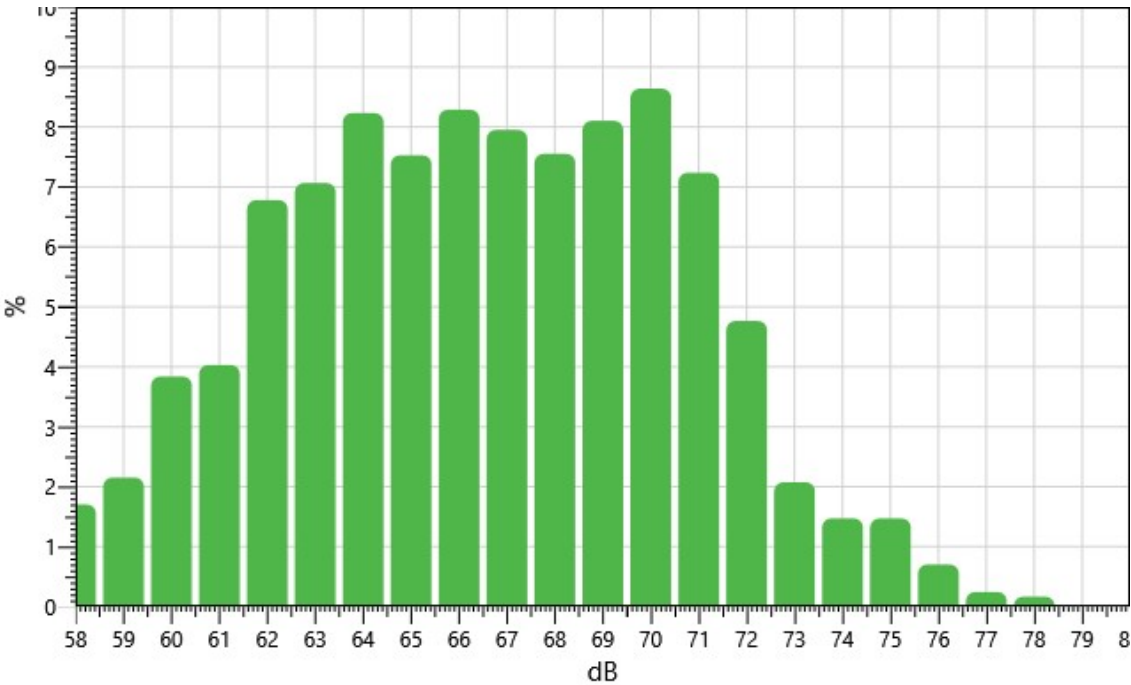
Statistics Table

dB:	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
58:	0.00	0.03	0.08	0.07	0.07	0.22	0.19	0.37	0.41	0.25	1.70
59:	0.18	0.16	0.12	0.10	0.29	0.33	0.25	0.26	0.18	0.29	2.15
60:	0.23	0.37	0.32	0.25	0.39	0.39	0.42	0.55	0.51	0.41	3.84
61:	0.31	0.31	0.41	0.39	0.18	0.51	0.47	0.48	0.54	0.43	4.03
62:	0.46	0.61	0.73	0.67	0.89	0.89	0.66	0.89	0.49	0.50	6.78
63:	0.70	0.54	0.68	0.69	0.63	0.74	0.84	0.79	0.78	0.66	7.07
64:	0.75	0.70	1.04	1.24	0.34	1.09	0.96	0.83	0.62	0.65	8.23
65:	0.81	0.77	0.61	0.79	0.76	0.73	0.68	0.77	0.81	0.80	7.53
66:	0.80	0.68	0.78	0.74	0.80	1.12	0.93	0.86	0.90	0.67	8.29
67:	0.78	0.81	0.83	0.78	0.25	1.03	0.95	0.91	0.74	0.88	7.95
68:	0.93	0.91	0.79	0.84	0.71	0.62	0.66	0.63	0.69	0.76	7.55
69:	0.67	0.68	0.69	0.83	0.70	0.71	0.80	0.94	1.00	1.07	8.10
70:	0.94	1.13	1.12	1.01	0.38	1.17	0.88	0.83	0.68	0.51	8.64
71:	0.57	0.77	0.79	0.80	0.72	0.75	0.72	0.82	0.74	0.57	7.24

72:	0.51	0.64	0.80	0.51	0.43	0.53	0.48	0.37	0.25	0.25	4.76
73:	0.29	0.30	0.28	0.27	0.12	0.30	0.15	0.14	0.09	0.13	2.07
74:	0.18	0.16	0.14	0.17	0.10	0.13	0.13	0.10	0.15	0.22	1.47
75:	0.17	0.13	0.10	0.19	0.14	0.13	0.16	0.15	0.11	0.20	1.47
76:	0.18	0.10	0.05	0.05	0.03	0.05	0.07	0.07	0.07	0.05	0.70
77:	0.05	0.02	0.02	0.04	0.03	0.02	0.02	0.01	0.01	0.01	0.24
78:	0.01	0.01	0.02	0.01	0.02	0.02	0.01	0.02	0.02	0.03	0.17
79:	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Statistics Chart

S008_BIJ050019_18032020_202744: Statistics Chart



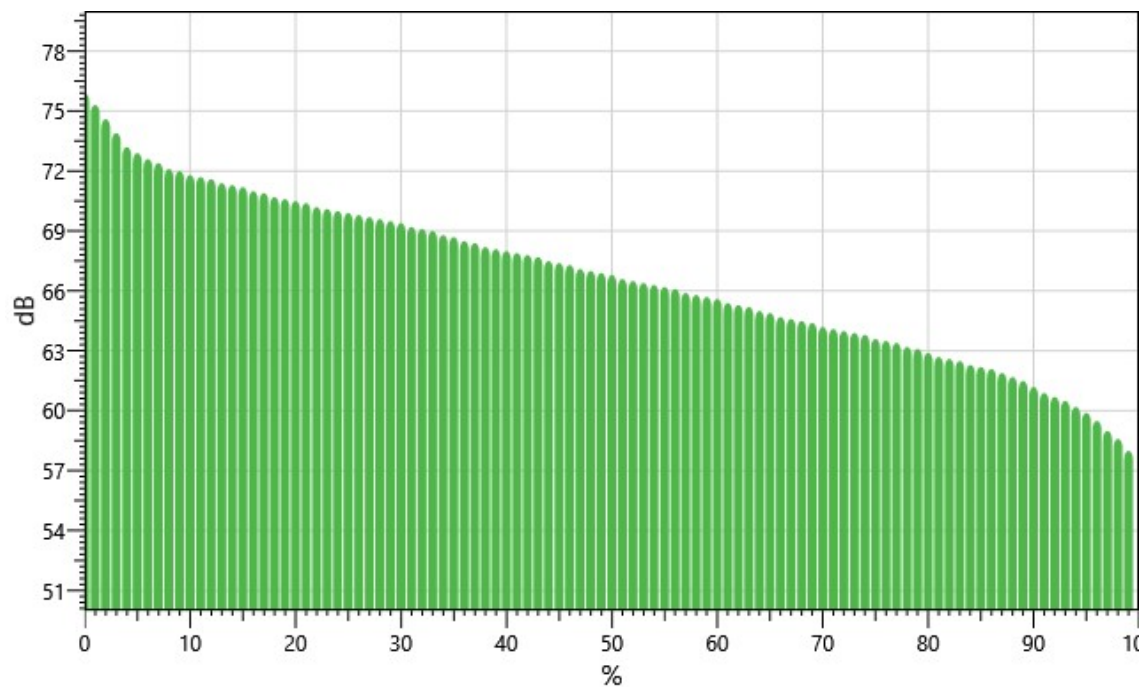
Exceedance Table

.	0%	1%	2%	3%	4%	5%	6%	%7	%8	%9
0%:		75.9	75.3	74.6	73.9	73.2	72.9	72.6	72.4	72.1
10%:	72.0	71.8	71.7	71.6	71.4	71.3	71.2	71.0	70.9	70.7
20%:	70.6	70.5	70.4	70.2	70.1	70.0	69.9	69.8	69.7	69.6
30%:	69.5	69.4	69.2	69.1	69.0	68.8	68.7	68.5	68.4	68.2
40%:	68.1	68.0	67.9	67.8	67.7	67.5	67.4	67.3	67.1	67.0
50%:	66.9	66.8	66.6	66.5	66.4	66.3	66.2	66.1	65.9	65.8
60%:	65.7	65.6	65.4	65.3	65.2	65.0	64.9	64.7	64.6	64.5

70%:	64.4	64.2	64.1	64.0	63.9	63.8	63.6	63.5	63.4	63.2
80%:	63.1	62.9	62.7	62.6	62.5	62.3	62.2	62.1	61.9	61.7
90%:	61.5	61.2	60.9	60.7	60.5	60.2	59.9	59.5	59.0	58.6
100%:	58.0									

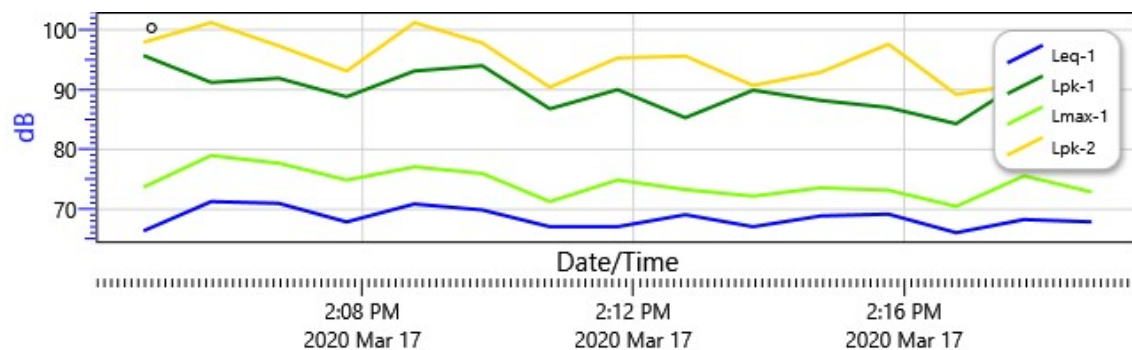
Exceedance Chart

S008_BII050019_18032020_202744: Exceedance Chart



Logged Data Chart

S008_BII050019_18032020_202744: Logged Data Chart



Session Report

10/19/2021

Information Panel

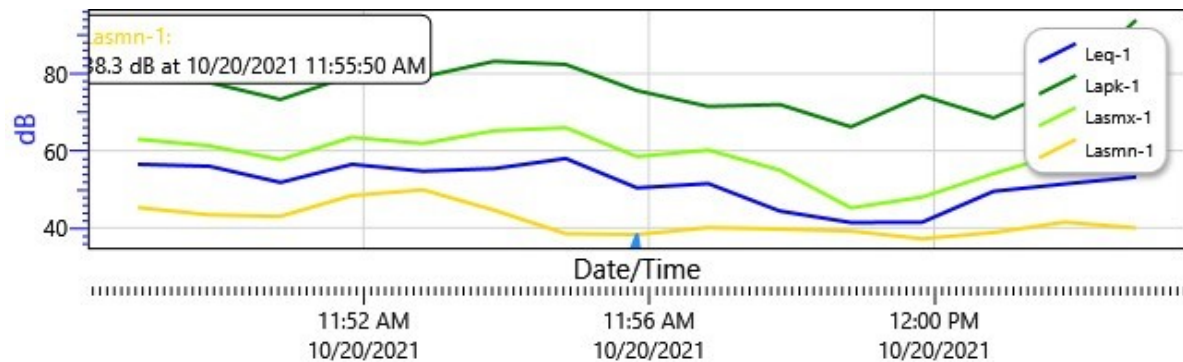
Name	Sherbourne Avenue
Comments	
Start Time	10/20/2021 11:47:50 AM
Stop Time	10/20/2021 12:03:00 PM
Run Time	00:15:10
Serial Number	SE40213991
Device Name	SE40213991
Model Type	Sound Examiner
Device Firmware Rev	R.11C
Company Name	
Description	
Location	
User Name	

Summary Data Panel

Description	Meter	Value	Description	Meter	Value
Leq	1	53.7 dB			
Exchange Rate	1	3 dB	Weighting	1	A
Response	1	SLOW	Bandwidth	1	OFF

Logged Data Chart

Sherbourne Avenue: Logged Data Chart



Logged Data Table

Date/Time	Lapx-1	Lasnm-1	Lasmx-1	Leq-1
-----------	--------	---------	---------	-------

Date/Time	Lapk-1	Lasmn-1	Lasmx-1	Leq-1
10/20/2021 11:48:50 AM	78.1	45.3	63	56.5
11:49:50 AM	77.7	43.4	61.3	56
11:50:50 AM	73.3	43	57.7	51.8
11:51:50 AM	79.5	48.4	63.5	56.5
11:52:50 AM	79.2	49.9	61.9	54.7
11:53:50 AM	83.2	44.6	65.2	55.4
11:54:50 AM	82.4	38.5	66	58
11:55:50 AM	75.6	38.3	58.5	50.4
11:56:50 AM	71.5	40.1	60.2	51.5
11:57:50 AM	72	39.7	55	44.4
11:58:50 AM	66.2	39.2	45.2	41.4
11:59:50 AM	74.3	37.2	48	41.5
12:00:50 PM	68.5	38.8	54.1	49.5
12:01:50 PM	76.9	41.5	59.6	51.4
12:02:50 PM	93.9	40	64	53.2

CONSTRUCTION NOISE

Source name	Level	Corrections		Cwall dB	CI	CT
	Reference dB(A)	dB	Day dB			
Construction Site		Lw/ 74.8		–	–	–

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:57 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 4 of 7.
(Please note: These files are in addition to the previous 20.)

Receiver list

No.	Receiver name	Coordinates		Building side	Floor	Height abv. ground m	Limit		Level w/o NP		Level w NP		Difference		Conflict	
		X	Y				Day	Night	Day	Night	Day	Night	Day	Night	Day	Night
		in meter					dB(A)		dB(A)		dB(A)		dB		dB	
1	250 La Cienega Medical Center	11373026	3770094	South	GF	44.11	-	-	29.6	0.0	0.0	0.0	-29.6	0.0	-	-
2	Holt Avenue 819	11372776	3769921	South	GF	43.98	-	-	54.3	0.0	0.0	0.0	-54.3	0.0	-	-
3	La Cienega Park	11373030	3769903	West	GF	44.18	-	-	35.9	0.0	0.0	0.0	-35.9	0.0	-	-
4	Margaret Herrick Library	11372941	3769743	West	GF	41.94	-	-	35.8	0.0	0.0	0.0	-35.8	0.0	-	-
5	Sherbourne Avenue	11372726	3769875	South	GF	43.78	-	-	41.7	0.0	0.0	0.0	-41.7	0.0	-	-

Contribution levels of the receivers

Source name		Level w/o NP		Level w NP	
		Day	Night	Day	Night
		dB(A)		dB(A)	
250 La Cienega Medical Building	GF	29.6	0.0	0.0	0.0
Construction Site		29.6	-	-	-
Holt Avenue 819	GF	54.3	0.0	0.0	0.0
Construction Site		54.3	-	-	-
La Cienega Park	GF	35.9	0.0	0.0	0.0
Construction Site		35.9	-	-	-
Margaret Herrick Library	GF	35.8	0.0	0.0	0.0
Construction Site		35.8	-	-	-
Sherbourne Avenue	GF	41.7	0.0	0.0	0.0
Construction Site		41.7	-	-	-



Signs and symbols

- Wall
- Analyzed Sensitive Receptor
- Construction Site

Level tables

- Facade with conflict

1 : 175

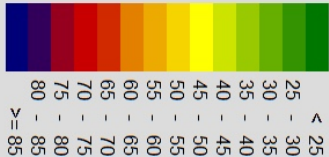


825 Holt Avenue

Signs and symbols

- Wall
- Calculation area
- Construction Site

Levels in dB(A)



Douglass Kim + Associates, LLC



Construction Noise Impacts (without Mitigation)

Reference	15.24	meter
Sound Pressure Level	74.8	dBA

Receptor		Existing Leq	Noise	New Leq	Difference Leq	Significant?
821 South Holt Avenue		52.4	54.3	56.5	4.1	No
Margaret Herrick Library		65.9	37.0	65.9	0.0	No
La Cienega Park		71.4	36.8	71.4	0.0	No
250 La Cienega Medical Building		68.8	30.8	68.8	0.0	No
Sherbourne Avenue		53.8	54.0	56.9	3.1	No



DOUGLASKIM+ASSOCIATES,LLC

CUMULATIVE CONSTRUCTION NOISE IMPACTS

Receiver list

No.	Receiver name	Coordinates		Building side	Floor	Height abv. ground m	Limit		Level w/o NP		Level w NP		Difference		Conflict	
		X	Y				Day	Night	Day	Night	Day	Night	Day	Night	Day	Night
		in meter					dB(A)		dB(A)		dB(A)		dB		dB	
1	250 La Cienega Medical Center	11373026	3770094	South	GF	44.11	-	-	30.8	0.0	0.0	0.0	-30.8	0.0	-	-
2	Holt Avenue 819	11372776	3769921	South	GF	43.98	-	-	54.3	0.0	0.0	0.0	-54.3	0.0	-	-
3	La Cienega Park	11373030	3769903	West	GF	44.18	-	-	36.8	0.0	0.0	0.0	-36.8	0.0	-	-
4	Margaret Herrick Library	11372941	3769743	West	GF	41.94	-	-	37.0	0.0	0.0	0.0	-37.0	0.0	-	-
5	Sherbourne Avenue	11372726	3769875	South	GF	43.78	-	-	54.0	0.0	0.0	0.0	-54.0	0.0	-	-

Contribution levels of the receivers

Source name		Level w/o NP		Level w NP	
		Day	Night	Day	Night
		dB(A)		dB(A)	
250 La Cienega Medical Building	GF	30.8	0.0	0.0	0.0
Construction Site		29.6	-	-	-
Construction Site (Related Project)		24.5	-	-	-
Holt Avenue 819	GF	54.3	0.0	0.0	0.0
Construction Site		54.3	-	-	-
Construction Site (Related Project)		33.6	-	-	-
La Cienega Park	GF	36.8	0.0	0.0	0.0
Construction Site		35.9	-	-	-
Construction Site (Related Project)		29.3	-	-	-
Margaret Herrick Library	GF	37.0	0.0	0.0	0.0
Construction Site		35.8	-	-	-
Construction Site (Related Project)		30.9	-	-	-
Sherbourne Avenue	GF	54.0	0.0	0.0	0.0
Construction Site		41.7	-	-	-
Construction Site (Related Project)		53.8	-	-	-

825 Holt Avenue

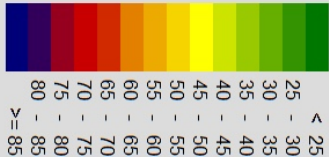
Signs and symbols

Wall

Calculation area

Construction Site

Levels in dB(A)



1 : 175



DOUGLASSKIM+ASSOCIATES,LLC



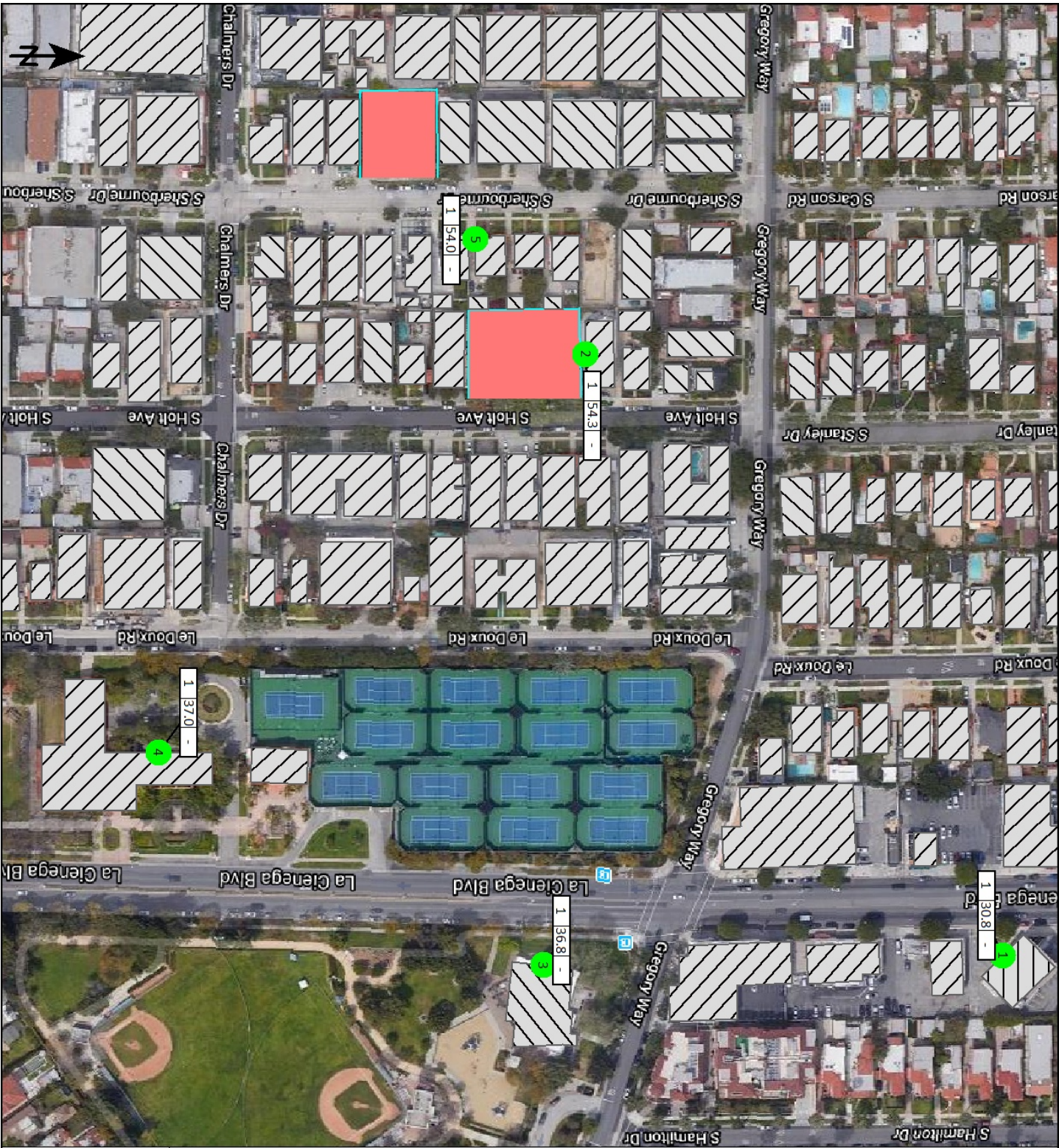
Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:58 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 5 of 7.
(Please note: These files are in addition to the previous 20.)



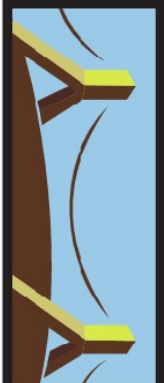
Signs and symbols

- Wall
- Analyzed Sensitive Receptor
- Construction Site

Level tables

- Facade with conflict

1 : 175



Cumulative Construction Noise Impacts

Reference	15.24	meter
Sound Pressure Level	74.8	dBA

Receptor		Existing Leq	Noise	New Leq	Difference Leq	Significant?
821 South Holt Avenue		52.4	54.3	56.5	4.1	No
Margaret Herrick Library		65.9	37.0	65.9	0.0	No
La Cienega Park		71.4	36.8	71.4	0.0	No
250 La Cienega Medical Building		68.8	30.8	68.8	0.0	No
Sherbourne Avenue		53.8	54.0	56.9	3.1	No

OPERATIONAL NOISE

Project: 825 Holt Avenue

Receiver Parameters	
Receiver:	824-826 Holt Avenue
Land Use Category:	2. Residential
Existing Noise (Measured or Generic Value):	52 dBA

Noise Source Parameters	
Number of Noise Sources:	1

Noise Source Parameters		Source 1
	Source Type:	Stationary Source
	Specific Source:	Parking Garage
Daytime hrs	Avg. Number of Autos/hr:	16
Nighttime hrs	Avg. Number of Autos/hr:	2
Distance	Distance from Source to Receiver (ft):	90
	Number of Intervening Rows of Buildings:	0
Adjustments	Noise Barrier?	No

Project Results Summary

Existing Ldn:	52 dBA
Total Project Ldn:	41 dBA
Total Noise Exposure:	53 dBA
Increase:	0 dB
Impact?:	None

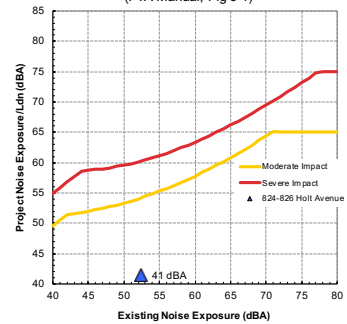
Distance to Impact Contours

Dist to Mod. Impact Contour:	(Source 1): 28 ft
Dist to Sev. Impact Contour:	(Source 1): 16 ft

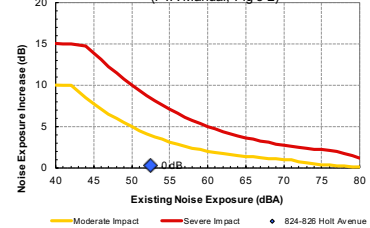
Source 1 Results

Leq(day):	41.1 dBA
Leq(night):	32.0 dBA
Ldn:	41.5 dBA

Noise Impact Criteria
(FTA Manual, Fig 3-1)



Increase in Cumulative Noise Levels Allowed
(FTA Manual, Fig 3-2)



CONSTRUCTION VIBRATION

Construction Vibration Impact Analysis

825 Holt Avenue Project

Page 1

Construction Vibration: UNMITIGATED

Receptor: 821 Holt Avenue
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Unmitigated Vibration Level (in/sec)	0.148

Receptor: 839 Holt Avenue
Equipment: Large Bulldozer, Auger Drill Rig

Source PPV (in/sec)	0.089
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	15
Unmitigated Vibration Level (in/sec)	0.148

825 Holt Avenue Project

Page 2

Receptor: 821 Holt Avenue
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	65
Unmitigated Vibration Level (in/sec)	0.001

Receptor: 839 Holt Avenue
Equipment: Small Dozer-Type Equipment

Source PPV (in/sec)	0.003
Reference Distance (ft)	25
Ground Factor (N)	1
Distance (ft)	280
Unmitigated Vibration Level (in/sec)	0.000

Sources

California Department of Transportation (Caltrans), *Transportation and Construction Vibration Guidance Manual*, September 2013.
Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment*, May 2006

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:59 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 6 of 7.
(Please note: These files are in addition to the previous 20.)

825 South Holt Avenue Existing - Los Angeles-South Coast County, Summer

825 South Holt Avenue Existing
Los Angeles-South Coast County, Summer

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	6.00	Dwelling Unit	0.41	10,617.00	17

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Los Angeles ZIMAS database

Woodstoves - Developer information

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberGas	5.10	0.00
tblFireplaces	NumberNoFireplace	0.60	6.00
tblFireplaces	NumberWood	0.30	0.00
tblLandUse	LandUseSquareFeet	6,000.00	10,617.00
tblLandUse	LotAcreage	0.38	0.41

tblWoodstoves	NumberCatalytic	0.30	0.00
tblWoodstoves	NumberNoncatalytic	0.30	0.00

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Energy	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Mobile	0.0903	0.4247	1.2429	4.0500e-003	0.3122	4.0300e-003	0.3162	0.0836	3.7800e-003	0.0873		411.0001	411.0001	0.0223		411.5571
Total	0.3364	0.4518	1.7486	4.2200e-003	0.3122	8.4900e-003	0.3207	0.0836	8.2400e-003	0.0918	0.0000	439.1908	439.1908	0.0237	5.0000e-004	439.9318

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Energy	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Mobile	0.0903	0.4247	1.2429	4.0500e-003	0.3122	4.0300e-003	0.3162	0.0836	3.7800e-003	0.0873		411.0001	411.0001	0.0223		411.5571
Total	0.3364	0.4518	1.7486	4.2200e-003	0.3122	8.4900e-003	0.3207	0.0836	8.2400e-003	0.0918	0.0000	439.1908	439.1908	0.0237	5.0000e-004	439.9318

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0903	0.4247	1.2429	4.0500e-003	0.3122	4.0300e-003	0.3162	0.0836	3.7800e-003	0.0873		411.0001	411.0001	0.0223		411.5571
Unmitigated	0.0903	0.4247	1.2429	4.0500e-003	0.3122	4.0300e-003	0.3162	0.0836	3.7800e-003	0.0873		411.0001	411.0001	0.0223		411.5571

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	39.54	42.96	36.42	135,261	135,261
Total	39.54	42.96	36.42	135,261	135,261

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.547726	0.045433	0.201486	0.122766	0.016611	0.006090	0.019326	0.029173	0.002436	0.002356	0.005006	0.000673	0.000907

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
NaturalGas Unmitigated	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	232.045	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Total		2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
--	----------------	-----	-----	----	-----	---------------	--------------	------------	----------------	---------------	-------------	----------	-----------	-----------	-----	-----	------

Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	0.232045	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Total		2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Unmitigated	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2102					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0151	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003		0.8913	0.8913	8.7000e-004		0.9130

Total	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
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Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2102					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0151	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003		0.8913	0.8913	8.7000e-004		0.9130
Total	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

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

11.0 Vegetation

825 South Holt Avenue Existing - Los Angeles-South Coast County, Annual

825 South Holt Avenue Existing

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	6.00	Dwelling Unit	0.41	10,617.00	17

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Los Angeles ZIMAS database

Woodstoves - Developer information

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberGas	5.10	0.00
tblFireplaces	NumberNoFireplace	0.60	6.00
tblFireplaces	NumberWood	0.30	0.00
tblLandUse	LandUseSquareFeet	6,000.00	10,617.00

tblLandUse	LotAcreage	0.38	0.41
tblWoodstoves	NumberCatalytic	0.30	0.00
tblWoodstoves	NumberNoncatalytic	0.30	0.00

2.0 Emissions Summary

2.2 Overall Operational
Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035
Energy	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	18.2816	18.2816	4.1000e-004	1.5000e-004	18.3366
Mobile	0.0144	0.0746	0.2009	6.5000e-004	0.0513	6.8000e-004	0.0520	0.0138	6.3000e-004	0.0144	0.0000	60.3167	60.3167	3.3600e-003	0.0000	60.4007
Waste						0.0000	0.0000		0.0000	0.0000	0.5603	0.0000	0.5603	0.0331	0.0000	1.3880
Water						0.0000	0.0000		0.0000	0.0000	0.1240	4.3601	4.4841	0.0128	3.2000e-004	4.9011
Total	0.0585	0.0793	0.2646	6.7000e-004	0.0513	1.3400e-003	0.0527	0.0138	1.2900e-003	0.0151	0.6843	83.0594	83.7437	0.0498	4.7000e-004	85.1300

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035

Energy	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	18.2816	18.2816	4.1000e-004	1.5000e-004	18.3366
Mobile	0.0144	0.0746	0.2009	6.5000e-004	0.0513	6.8000e-004	0.0520	0.0138	6.3000e-004	0.0144	0.0000	60.3167	60.3167	3.3600e-003	0.0000	60.4007
Waste						0.0000	0.0000		0.0000	0.0000	0.5603	0.0000	0.5603	0.0331	0.0000	1.3880
Water						0.0000	0.0000		0.0000	0.0000	0.1240	4.3601	4.4841	0.0128	3.2000e-004	4.9011
Total	0.0585	0.0793	0.2646	6.7000e-004	0.0513	1.3400e-003	0.0527	0.0138	1.2900e-003	0.0151	0.6843	83.0594	83.7437	0.0498	4.7000e-004	85.1300

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0144	0.0746	0.2009	6.5000e-004	0.0513	6.8000e-004	0.0520	0.0138	6.3000e-004	0.0144	0.0000	60.3167	60.3167	3.3600e-003	0.0000	60.4007
Unmitigated	0.0144	0.0746	0.2009	6.5000e-004	0.0513	6.8000e-004	0.0520	0.0138	6.3000e-004	0.0144	0.0000	60.3167	60.3167	3.3600e-003	0.0000	60.4007

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	39.54	42.96	36.42	135,261	135,261
Total	39.54	42.96	36.42	135,261	135,261

4.3 Trip Type Information

	Miles	Trip %	Trip Purpose %
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Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.547726	0.045437	0.201486	0.122766	0.016614	0.006090	0.019326	0.029174	0.002436	0.002356	0.005005	0.000677	0.000907

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.7618	13.7618	3.3000e-004	7.0000e-005	13.7900
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	13.7618	13.7618	3.3000e-004	7.0000e-005	13.7900
NaturalGas Mitigated	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466
NaturalGas Unmitigated	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	84696.4	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466
Total		4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	84696.4	4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466
Total		4.6000e-004	3.9000e-003	1.6600e-003	2.0000e-005		3.2000e-004	3.2000e-004		3.2000e-004	3.2000e-004	0.0000	4.5197	4.5197	9.0000e-005	8.0000e-005	4.5466

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	24708.8	13.7618	3.3000e-004	7.0000e-005	13.7900
Total		13.7618	3.3000e-004	7.0000e-005	13.7900

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	24708.8	13.7618	3.3000e-004	7.0000e-005	13.7900
Total		13.7618	3.3000e-004	7.0000e-005	13.7900

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035
Unmitigated	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					

Architectural Coating	3.3200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0384					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.8900e-003	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035
Total	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	3.3200e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0384					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	1.8900e-003	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035
Total	0.0436	7.2000e-004	0.0621	0.0000		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	0.1011	0.1011	1.0000e-004	0.0000	0.1035

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	4.4841	0.0128	3.2000e-004	4.9011

Unmitigated	4.4841	0.0128	3.2000e-004	4.9011
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7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0.390924 / 0.246452	4.4841	0.0128	3.2000e-004	4.9011
Total		4.4841	0.0128	3.2000e-004	4.9011

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	0.390924 / 0.246452	4.4841	0.0128	3.2000e-004	4.9011
Total		4.4841	0.0128	3.2000e-004	4.9011

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.5603	0.0331	0.0000	1.3880
Unmitigated	0.5603	0.0331	0.0000	1.3880

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2.76	0.5603	0.0331	0.0000	1.3880
Total		0.5603	0.0331	0.0000	1.3880

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	2.76	0.5603	0.0331	0.0000	1.3880

Total		0.5603	0.0331	0.0000	1.3880
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9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

825 South Holt Avenue Existing - Los Angeles-South Coast County, Winter

825 South Holt Avenue Existing
Los Angeles-South Coast County, Winter

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	6.00	Dwelling Unit	0.41	10,617.00	17

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2020
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - City of Los Angeles ZIMAS database

Woodstoves - Developer information

Table Name	Column Name	Default Value	New Value
tblFireplaces	NumberGas	5.10	0.00
tblFireplaces	NumberNoFireplace	0.60	6.00
tblFireplaces	NumberWood	0.30	0.00
tblLandUse	LandUseSquareFeet	6,000.00	10,617.00
tblLandUse	LotAcreage	0.38	0.41

tblWoodstoves	NumberCatalytic	0.30	0.00
tblWoodstoves	NumberNoncatalytic	0.30	0.00

2.0 Emissions Summary

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Energy	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Mobile	0.0879	0.4367	1.1810	3.8500e-003	0.3122	4.0500e-003	0.3162	0.0836	3.8000e-003	0.0874		391.0060	391.0060	0.0222		391.5599
Total	0.3340	0.4639	1.6867	4.0200e-003	0.3122	8.5100e-003	0.3207	0.0836	8.2600e-003	0.0918	0.0000	419.1968	419.1968	0.0236	5.0000e-004	419.9346

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Energy	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Mobile	0.0879	0.4367	1.1810	3.8500e-003	0.3122	4.0500e-003	0.3162	0.0836	3.8000e-003	0.0874		391.0060	391.0060	0.0222		391.5599
Total	0.3340	0.4639	1.6867	4.0200e-003	0.3122	8.5100e-003	0.3207	0.0836	8.2600e-003	0.0918	0.0000	419.1968	419.1968	0.0236	5.0000e-004	419.9346

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0879	0.4367	1.1810	3.8500e-003	0.3122	4.0500e-003	0.3162	0.0836	3.8000e-003	0.0874		391.0060	391.0060	0.0222		391.5599
Unmitigated	0.0879	0.4367	1.1810	3.8500e-003	0.3122	4.0500e-003	0.3162	0.0836	3.8000e-003	0.0874		391.0060	391.0060	0.0222		391.5599

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	39.54	42.96	36.42	135,261	135,261
Total	39.54	42.96	36.42	135,261	135,261

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.547726	0.045437	0.201486	0.122766	0.016617	0.006090	0.019326	0.029177	0.002436	0.002356	0.005006	0.000677	0.000907

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
NaturalGas Unmitigated	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	232.045	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Total		2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	0.232045	2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616
Total		2.5000e-003	0.0214	9.1000e-003	1.4000e-004		1.7300e-003	1.7300e-003		1.7300e-003	1.7300e-003		27.2994	27.2994	5.2000e-004	5.0000e-004	27.4616

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130
Unmitigated	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2102					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0151	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003		0.8913	0.8913	8.7000e-004		0.9130
Total	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0182					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.2102					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0151	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003		0.8913	0.8913	8.7000e-004		0.9130
Total	0.2435	5.7400e-003	0.4967	3.0000e-005		2.7300e-003	2.7300e-003		2.7300e-003	2.7300e-003	0.0000	0.8913	0.8913	8.7000e-004	0.0000	0.9130

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

825 South Holt Avenue Future - Los Angeles-South Coast County, Summer

825 South Holt Avenue Future
Los Angeles-South Coast County, Summer

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	36.00	Space	0.00	14,400.00	0
Congregate Care (Assisted Living)	112.00	Dwelling Unit	0.41	30,996.00	112

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2022
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Developer information

Construction Phase -

Trips and VMT - Assumes 10CY capacity per haul truck, 30-mile distance to landfill

Demolition - Assumes 4,718 CY of buildings demolished @ 400 lb/CY = 944 tons
 9,010 sf of asphalt at 6" of depth @ 2,600 lb/CY = 217 tons

Grading - Assumes entire site excavated to 21.25 feet in depth

Vehicle Trips - ITE 9th Edition

Woodstoves - Developer information

Construction Off-road Equipment Mitigation - Assumes SCAQMD Rule 403 control efficiencies

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	46
tblConstructionPhase	NumDays	5.00	88.00
tblConstructionPhase	NumDays	100.00	327.00
tblConstructionPhase	NumDays	10.00	23.00
tblConstructionPhase	NumDays	2.00	22.00
tblConstructionPhase	NumDays	1.00	21.00
tblFireplaces	NumberGas	95.20	0.00
tblFireplaces	NumberNoFireplace	11.20	115.00
tblFireplaces	NumberWood	5.60	0.00
tblGrading	AcresOfGrading	0.00	0.41
tblGrading	AcresOfGrading	10.50	0.50
tblGrading	MaterialExported	0.00	14,215.00
tblLandUse	LandUseSquareFeet	112,000.00	30,996.00
tblLandUse	LotAcreage	0.32	0.00
tblLandUse	LotAcreage	7.00	0.41
tblLandUse	Population	320.00	112.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	1,777.00	1,421.00
tblTripsAndVMT	VendorTripNumber	14.00	15.00
tblTripsAndVMT	WorkerTripNumber	87.00	89.00
tblTripsAndVMT	WorkerTripNumber	17.00	18.00
tblVehicleTrips	HO_TTP	40.60	41.00
tblVehicleTrips	HS_TTP	19.20	19.00
tblVehicleTrips	HW_TTP	40.20	40.00
tblWoodstoves	NumberCatalytic	5.60	0.00
tblWoodstoves	NumberNoncatalytic	5.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.7052	32.6580	13.8460	0.0862	2.6507	0.5557	3.2064	0.9207	0.5303	1.4510	0.0000	9,184.3233	9,184.3233	0.7319	0.0000	9,202.6215
2021	3.7476	11.2834	13.7716	0.0305	1.2920	0.5543	1.8463	0.3448	0.5176	0.8624	0.0000	3,015.4685	3,015.4685	0.4363	0.0000	3,026.3763
Maximum	3.7476	32.6580	13.8460	0.0862	2.6507	0.5557	3.2064	0.9207	0.5303	1.4510	0.0000	9,184.3233	9,184.3233	0.7319	0.0000	9,202.6215

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.7052	32.6580	13.8460	0.0862	1.4845	0.5557	2.0402	0.4963	0.5303	1.0266	0.0000	9,184.3233	9,184.3233	0.7319	0.0000	9,202.6215
2021	3.7476	11.2834	13.7716	0.0305	0.7823	0.5543	1.3366	0.2197	0.5176	0.7373	0.0000	3,015.4685	3,015.4685	0.4363	0.0000	3,026.3763
Maximum	3.7476	32.6580	13.8460	0.0862	1.4845	0.5557	2.0402	0.4963	0.5303	1.0266	0.0000	9,184.3233	9,184.3233	0.7319	0.0000	9,202.6215

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	42.51	0.00	33.17	43.42	0.00	23.75	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Energy	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Mobile	0.5532	2.6484	7.5327	0.0274	2.2286	0.0221	2.2506	0.5964	0.0206	0.6170		2,788.9173	2,788.9173	0.1394		2,792.4031
Total	1.5365	3.0158	16.8973	0.0296	2.2286	0.0943	2.3228	0.5964	0.0928	0.6892	0.0000	3,138.2938	3,138.2938	0.1619	6.1000e-003	3,144.1587

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Energy	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Mobile	0.5532	2.6484	7.5327	0.0274	2.2286	0.0221	2.2506	0.5964	0.0206	0.6170		2,788.9173	2,788.9173	0.1394		2,792.4031
Total	1.5365	3.0158	16.8973	0.0296	2.2286	0.0943	2.3228	0.5964	0.0928	0.6892	0.0000	3,138.2938	3,138.2938	0.1619	6.1000e-003	3,144.1587

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/1/2020	7/31/2020	5	23	
2	Site Preparation	Site Preparation	8/3/2020	8/31/2020	5	21	
3	Grading	Grading	9/1/2020	9/30/2020	5	22	
4	Building Construction	Building Construction	10/1/2020	12/31/2021	5	327	
5	Architectural Coating	Architectural Coating	9/1/2021	12/31/2021	5	88	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.41

Acres of Paving: 0

Residential Indoor: 62,767; Residential Outdoor: 20,922; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 864

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	5.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	1,421.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	89.00	15.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0497	0.0000	0.0497	7.5200e-003	0.0000	7.5200e-003			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457		1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.0497	0.4672	0.5169	7.5200e-003	0.4457	0.4532		1,147.2352	1,147.2352	0.2169		1,152.6578

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	2.6600e-003	0.0833	0.0195	2.5000e-004	5.7000e-003	2.9000e-004	5.9900e-003	1.5600e-003	2.8000e-004	1.8400e-003		26.6543	26.6543	1.7200e-003		26.6973
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.0487	0.1161	0.4573	1.4300e-003	0.1175	1.2200e-003	0.1187	0.0312	1.1400e-003	0.0323		144.2656	144.2656	5.4300e-003		144.4013

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0184	0.0000	0.0184	2.7900e-003	0.0000	2.7900e-003			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.0184	0.4672	0.4856	2.7900e-003	0.4457	0.4485	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.6600e-003	0.0833	0.0195	2.5000e-004	3.7200e-003	2.9000e-004	4.0100e-003	1.0800e-003	2.8000e-004	1.3600e-003		26.6543	26.6543	1.7200e-003		26.6973
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.0671	9.3000e-004	0.0680	0.0187	8.6000e-004	0.0195		117.6113	117.6113	3.7100e-003		117.7040

Total	0.0487	0.1161	0.4573	1.4300e-003	0.0708	1.2200e-003	0.0720	0.0198	1.1400e-003	0.0209		144.2656	144.2656	5.4300e-003		144.4013
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3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0253	0.0000	0.0253	2.7300e-003	0.0000	2.7300e-003			0.0000			0.0000
Off-Road	0.6853	8.4307	4.0942	9.7400e-003		0.3353	0.3353		0.3085	0.3085		943.4872	943.4872	0.3051		951.1158
Total	0.6853	8.4307	4.0942	9.7400e-003	0.0253	0.3353	0.3606	2.7300e-003	0.3085	0.3113		943.4872	943.4872	0.3051		951.1158

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0230	0.0164	0.2189	5.9000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		58.8056	58.8056	1.8500e-003		58.8520
Total	0.0230	0.0164	0.2189	5.9000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		58.8056	58.8056	1.8500e-003		58.8520

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.3600e-003	0.0000	9.3600e-003	1.0100e-003	0.0000	1.0100e-003			0.0000			0.0000
Off-Road	0.6853	8.4307	4.0942	9.7400e-003		0.3353	0.3353		0.3085	0.3085	0.0000	943.4872	943.4872	0.3051		951.1158
Total	0.6853	8.4307	4.0942	9.7400e-003	9.3600e-003	0.3353	0.3447	1.0100e-003	0.3085	0.3095	0.0000	943.4872	943.4872	0.3051		951.1158

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0230	0.0164	0.2189	5.9000e-004	0.0335	4.7000e-004	0.0340	9.3400e-003	4.3000e-004	9.7700e-003		58.8056	58.8056	1.8500e-003		58.8520
Total	0.0230	0.0164	0.2189	5.9000e-004	0.0335	4.7000e-004	0.0340	9.3400e-003	4.3000e-004	9.7700e-003		58.8056	58.8056	1.8500e-003		58.8520

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Fugitive Dust					0.8456	0.0000	0.8456	0.4270	0.0000	0.4270			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457		1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.8456	0.4672	1.3128	0.4270	0.4457	0.8727		1,147.2352	1,147.2352	0.2169		1,152.6578

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.7918	24.7524	5.7856	0.0731	1.6933	0.0876	1.7809	0.4641	0.0838	0.5479		7,919.4768	7,919.4768	0.5113		7,932.2597
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.8378	24.7851	6.2234	0.0743	1.8051	0.0885	1.8936	0.4937	0.0846	0.5784		8,037.0881	8,037.0881	0.5150		8,049.9637

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3133	0.0000	0.3133	0.1582	0.0000	0.1582			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.3133	0.4672	0.7805	0.1582	0.4457	0.6039	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.7918	24.7524	5.7856	0.0731	1.1041	0.0876	1.1917	0.3195	0.0838	0.4032		7,919.4768	7,919.4768	0.5113		7,932.2597
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.0671	9.3000e-004	0.0680	0.0187	8.6000e-004	0.0195		117.6113	117.6113	3.7100e-003		117.7040
Total	0.8378	24.7851	6.2234	0.0743	1.1712	0.0885	1.2597	0.3381	0.0846	0.4228		8,037.0881	8,037.0881	0.5150		8,049.9637

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962
Total	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0534	1.5956	0.4181	3.8900e-003	0.0960	7.5100e-003	0.1035	0.0277	7.1800e-003	0.0348		415.5370	415.5370	0.0254		416.1710
Worker	0.4096	0.2914	3.8968	0.0105	0.9948	8.3200e-003	1.0031	0.2638	7.6600e-003	0.2715		1,046.7405	1,046.7405	0.0330		1,047.5655
Total	0.4629	1.8870	4.3149	0.0144	1.0908	0.0158	1.1067	0.2915	0.0148	0.3063		1,462.2775	1,462.2775	0.0584		1,463.7365

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962
Total	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0534	1.5956	0.4181	3.8900e-003	0.0646	7.5100e-003	0.0721	0.0199	7.1800e-003	0.0271		415.5370	415.5370	0.0254		416.1710
Worker	0.4096	0.2914	3.8968	0.0105	0.5970	8.3200e-003	0.6053	0.1662	7.6600e-003	0.1738		1,046.7405	1,046.7405	0.0330		1,047.5655

Total	0.4629	1.8870	4.3149	0.0144	0.6615	0.0158	0.6774	0.1861	0.0148	0.2010		1,462.2775	1,462.2775	0.0584		1,463.7365
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3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0456	1.4563	0.3807	3.8600e-003	0.0960	2.9800e-003	0.0990	0.0277	2.8500e-003	0.0305		412.3210	412.3210	0.0243		412.9282
Worker	0.3815	0.2622	3.5847	0.0102	0.9948	8.0400e-003	1.0029	0.2638	7.4000e-003	0.2712		1,013.5052	1,013.5052	0.0299		1,014.2517
Total	0.4271	1.7186	3.9654	0.0140	1.0908	0.0110	1.1019	0.2915	0.0103	0.3017		1,425.8261	1,425.8261	0.0542		1,427.1800

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0456	1.4563	0.3807	3.8600e-003	0.0646	2.9800e-003	0.0675	0.0199	2.8500e-003	0.0228		412.3210	412.3210	0.0243		412.9282
Worker	0.3815	0.2622	3.5847	0.0102	0.5970	8.0400e-003	0.6050	0.1662	7.4000e-003	0.1736		1,013.5052	1,013.5052	0.0299		1,014.2517
Total	0.4271	1.7186	3.9654	0.0140	0.6615	0.0110	0.6726	0.1861	0.0103	0.1964		1,425.8261	1,425.8261	0.0542		1,427.1800

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Archit. Coating	2.2495					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	2.4684	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.2495					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	2.4684	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.1207	1.6300e-003	0.1224	0.0336	1.5000e-003	0.0351		204.9786	204.9786	6.0400e-003		205.1296
Total	0.0772	0.0530	0.7250	2.0600e-003	0.1207	1.6300e-003	0.1224	0.0336	1.5000e-003	0.0351		204.9786	204.9786	6.0400e-003		205.1296

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.5532	2.6484	7.5327	0.0274	2.2286	0.0221	2.2506	0.5964	0.0206	0.6170		2,788.9173	2,788.9173	0.1394		2,792.4031
Unmitigated	0.5532	2.6484	7.5327	0.0274	2.2286	0.0221	2.2506	0.5964	0.0206	0.6170		2,788.9173	2,788.9173	0.1394		2,792.4031

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Congregate Care (Assisted Living)	306.88	246.40	273.28	1,002,122	1,002,122
Enclosed Parking with Elevator	0.00	0.00	0.00		
Total	306.88	246.40	273.28	1,002,122	1,002,122

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Congregate Care (Assisted Living)	14.70	5.90	8.70	40.00	19.00	41.00	86	11	3
Enclosed Parking with Elevator	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Congregate Care (Assisted Living)	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087
Enclosed Parking with Elevator	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
NaturalGas Unmitigated	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Congregate Care (Assisted Living)	2828.21	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Congregate Care (Assisted Living)	2.82821	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Unmitigated	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0542					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.6188					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2797	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511		16.6457	16.6457	0.0161		17.0476
Total	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0542					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.6188					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2797	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511		16.6457	16.6457	0.0161		17.0476
Total	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

825 South Holt Avenue Future - Los Angeles-South Coast County, Annual

825 South Holt Avenue Future
Los Angeles-South Coast County, Annual

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	36.00	Space	0.00	14,400.00	0
Congregate Care (Assisted Living)	112.00	Dwelling Unit	0.41	30,996.00	112

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2022
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Developer information

Construction Phase -

Trips and VMT - Assumes 10CY capacity per haul truck, 30-mile distance to landfill

Demolition - Assumes 4,718 CY of buildings demolished @ 400 lb/CY = 944 tons

Grading - Assumes entire site excavated to 21.25 feet in depth

Vehicle Trips - ITE 9th Edition

Woodstoves - Developer information

Construction Off-road Equipment Mitigation - Assumes SCAQMD Rule 403 control efficiencies

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	46
tblConstructionPhase	NumDays	5.00	88.00
tblConstructionPhase	NumDays	100.00	327.00
tblConstructionPhase	NumDays	10.00	23.00
tblConstructionPhase	NumDays	2.00	22.00
tblConstructionPhase	NumDays	1.00	21.00
tblFireplaces	NumberGas	95.20	0.00
tblFireplaces	NumberNoFireplace	11.20	115.00
tblFireplaces	NumberWood	5.60	0.00
tblGrading	AcresOfGrading	0.00	0.41
tblGrading	AcresOfGrading	10.50	0.50
tblGrading	MaterialExported	0.00	14,215.00
tblLandUse	LandUseSquareFeet	112,000.00	30,996.00
tblLandUse	LotAcreage	0.32	0.00
tblLandUse	LotAcreage	7.00	0.41
tblLandUse	Population	320.00	112.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	1,777.00	1,421.00
tblTripsAndVMT	VendorTripNumber	14.00	15.00
tblTripsAndVMT	WorkerTripNumber	87.00	89.00
tblTripsAndVMT	WorkerTripNumber	17.00	18.00
tblVehicleTrips	HO_TTP	40.60	41.00
tblVehicleTrips	HS_TTP	19.20	19.00
tblVehicleTrips	HW_TTP	40.20	40.00
tblWoodstoves	NumberCatalytic	5.60	0.00
tblWoodstoves	NumberNoncatalytic	5.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0806	0.9073	0.6701	2.0400e-003	0.0669	0.0328	0.0996	0.0201	0.0306	0.0507	0.0000	189.4589	189.4589	0.0250	0.0000	190.0841
2021	0.2692	1.3440	1.5494	3.4700e-003	0.1483	0.0641	0.2123	0.0397	0.0593	0.0990	0.0000	312.7831	312.7831	0.0496	0.0000	314.0226
Maximum	0.2692	1.3440	1.5494	3.4700e-003	0.1483	0.0641	0.2123	0.0397	0.0593	0.0990	0.0000	312.7831	312.7831	0.0496	0.0000	314.0226

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0806	0.9073	0.6701	2.0400e-003	0.0391	0.0328	0.0719	0.0118	0.0306	0.0424	0.0000	189.4588	189.4588	0.0250	0.0000	190.0840
2021	0.2692	1.3440	1.5494	3.4700e-003	0.0901	0.0641	0.1541	0.0254	0.0593	0.0847	0.0000	312.7829	312.7829	0.0496	0.0000	314.0225
Maximum	0.2692	1.3440	1.5494	3.4700e-003	0.0901	0.0641	0.1541	0.0254	0.0593	0.0847	0.0000	312.7829	312.7829	0.0496	0.0000	314.0225

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	39.99	0.00	27.57	37.76	0.00	15.08	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
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1	4-17-2020	7-16-2020	0.0509	0.0509
2	7-17-2020	10-16-2020	0.5801	0.5801
3	10-17-2020	1-16-2021	0.3923	0.3923
4	1-17-2021	4-16-2021	0.3524	0.3524
5	4-17-2021	7-16-2021	0.3544	0.3544
6	7-17-2021	9-30-2021	0.3402	0.3402
		Highest	0.5801	0.5801

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332
Energy	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	349.1145	349.1145	8.0000e-003	2.4500e-003	350.0436
Mobile	0.0913	0.4810	1.2603	4.6000e-003	0.3804	3.8500e-003	0.3842	0.1020	3.5900e-003	0.1055	0.0000	424.9919	424.9919	0.0219	0.0000	425.5382
Waste						0.0000	0.0000		0.0000	0.0000	20.7457	0.0000	20.7457	1.2260	0.0000	51.3965
Water						0.0000	0.0000		0.0000	0.0000	2.3151	81.3879	83.7030	0.2397	6.0100e-003	91.4872
Total	0.2547	0.5419	2.4373	4.9600e-003	0.3804	0.0141	0.3944	0.1020	0.0138	0.1158	23.0608	857.3819	880.4427	1.4974	8.4600e-003	920.3987

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Area	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332
Energy	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	349.1145	349.1145	8.0000e-003	2.4500e-003	350.0436
Mobile	0.0913	0.4810	1.2603	4.6000e-003	0.3804	3.8500e-003	0.3842	0.1020	3.5900e-003	0.1055	0.0000	424.9919	424.9919	0.0219	0.0000	425.5382
Waste						0.0000	0.0000		0.0000	0.0000	20.7457	0.0000	20.7457	1.2260	0.0000	51.3965
Water						0.0000	0.0000		0.0000	0.0000	2.3151	81.3879	83.7030	0.2397	6.0100e-003	91.4872
Total	0.2547	0.5419	2.4373	4.9600e-003	0.3804	0.0141	0.3944	0.1020	0.0138	0.1158	23.0608	857.3819	880.4427	1.4974	8.4600e-003	920.3987

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/1/2020	7/31/2020	5	23	
2	Site Preparation	Site Preparation	8/3/2020	8/31/2020	5	21	
3	Grading	Grading	9/1/2020	9/30/2020	5	22	
4	Building Construction	Building Construction	10/1/2020	12/31/2021	5	327	
5	Architectural Coating	Architectural Coating	9/1/2021	12/31/2021	5	88	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0.41

Acres of Paving: 0

Residential Indoor: 62,767; Residential Outdoor: 20,922; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 864

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73

Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	5.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	1,421.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	89.00	15.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.7000e-004	0.0000	5.7000e-004	9.0000e-005	0.0000	9.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.9700e-003	0.0905	0.0877	1.4000e-004		5.3700e-003	5.3700e-003		5.1300e-003	5.1300e-003	0.0000	11.9687	11.9687	2.2600e-003	0.0000	12.0253
Total	9.9700e-003	0.0905	0.0877	1.4000e-004	5.7000e-004	5.3700e-003	5.9400e-003	9.0000e-005	5.1300e-003	5.2200e-003	0.0000	11.9687	11.9687	2.2600e-003	0.0000	12.0253

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.0000e-005	1.0000e-003	2.3000e-004	0.0000	6.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.2767	0.2767	2.0000e-005	0.0000	0.2771
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	4.3000e-004	4.7300e-003	1.0000e-005	1.2600e-003	1.0000e-005	1.2700e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.1746	1.1746	4.0000e-005	0.0000	1.1755
Total	5.6000e-004	1.4300e-003	4.9600e-003	1.0000e-005	1.3200e-003	1.0000e-005	1.3400e-003	3.5000e-004	1.0000e-005	3.6000e-004	0.0000	1.4512	1.4512	6.0000e-005	0.0000	1.4526

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.1000e-004	0.0000	2.1000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Off-Road	9.9700e-003	0.0905	0.0877	1.4000e-004		5.3700e-003	5.3700e-003		5.1300e-003	5.1300e-003	0.0000	11.9687	11.9687	2.2600e-003	0.0000	12.0252
Total	9.9700e-003	0.0905	0.0877	1.4000e-004	2.1000e-004	5.3700e-003	5.5800e-003	3.0000e-005	5.1300e-003	5.1600e-003	0.0000	11.9687	11.9687	2.2600e-003	0.0000	12.0252

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.0000e-005	1.0000e-003	2.3000e-004	0.0000	4.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	2.0000e-005	0.0000	0.2767	0.2767	2.0000e-005	0.0000	0.2771
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	4.3000e-004	4.7300e-003	1.0000e-005	7.6000e-004	1.0000e-005	7.7000e-004	2.1000e-004	1.0000e-005	2.2000e-004	0.0000	1.1746	1.1746	4.0000e-005	0.0000	1.1755
Total	5.6000e-004	1.4300e-003	4.9600e-003	1.0000e-005	8.0000e-004	1.0000e-005	8.2000e-004	2.2000e-004	1.0000e-005	2.4000e-004	0.0000	1.4512	1.4512	6.0000e-005	0.0000	1.4526

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.7000e-004	0.0000	2.7000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2000e-003	0.0885	0.0430	1.0000e-004		3.5200e-003	3.5200e-003		3.2400e-003	3.2400e-003	0.0000	8.9871	8.9871	2.9100e-003	0.0000	9.0598
Total	7.2000e-003	0.0885	0.0430	1.0000e-004	2.7000e-004	3.5200e-003	3.7900e-003	3.0000e-005	3.2400e-003	3.2700e-003	0.0000	8.9871	8.9871	2.9100e-003	0.0000	9.0598

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.4000e-004	2.0000e-004	2.1600e-003	1.0000e-005	5.8000e-004	0.0000	5.8000e-004	1.5000e-004	0.0000	1.6000e-004	0.0000	0.5362	0.5362	2.0000e-005	0.0000	0.5366
Total	2.4000e-004	2.0000e-004	2.1600e-003	1.0000e-005	5.8000e-004	0.0000	5.8000e-004	1.5000e-004	0.0000	1.6000e-004	0.0000	0.5362	0.5362	2.0000e-005	0.0000	0.5366

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.0000e-004	0.0000	1.0000e-004	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.2000e-003	0.0885	0.0430	1.0000e-004		3.5200e-003	3.5200e-003		3.2400e-003	3.2400e-003	0.0000	8.9871	8.9871	2.9100e-003	0.0000	9.0598
Total	7.2000e-003	0.0885	0.0430	1.0000e-004	1.0000e-004	3.5200e-003	3.6200e-003	1.0000e-005	3.2400e-003	3.2500e-003	0.0000	8.9871	8.9871	2.9100e-003	0.0000	9.0598

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Worker	5.1000e-004	4.1000e-004	4.5300e-003	1.0000e-005	1.2100e-003	1.0000e-005	1.2200e-003	3.2000e-004	1.0000e-005	3.3000e-004	0.0000	1.1235	1.1235	4.0000e-005	0.0000	1.1244
Total	9.2800e-003	0.2833	0.0693	8.1000e-004	0.0195	9.8000e-004	0.0205	5.3500e-003	9.4000e-004	6.2800e-003	0.0000	79.7532	79.7532	5.2000e-003	0.0000	79.8832

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					3.4500e-003	0.0000	3.4500e-003	1.7400e-003	0.0000	1.7400e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.5400e-003	0.0866	0.0839	1.3000e-004		5.1400e-003	5.1400e-003		4.9000e-003	4.9000e-003	0.0000	11.4483	11.4483	2.1600e-003	0.0000	11.5024
Total	9.5400e-003	0.0866	0.0839	1.3000e-004	3.4500e-003	5.1400e-003	8.5900e-003	1.7400e-003	4.9000e-003	6.6400e-003	0.0000	11.4483	11.4483	2.1600e-003	0.0000	11.5024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.7700e-003	0.2829	0.0648	8.0000e-004	0.0120	9.7000e-004	0.0129	3.4700e-003	9.3000e-004	4.4000e-003	0.0000	78.6297	78.6297	5.1600e-003	0.0000	78.7588
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.1000e-004	4.1000e-004	4.5300e-003	1.0000e-005	7.2000e-004	1.0000e-005	7.4000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	1.1235	1.1235	4.0000e-005	0.0000	1.1244
Total	9.2800e-003	0.2833	0.0693	8.1000e-004	0.0127	9.8000e-004	0.0137	3.6700e-003	9.4000e-004	4.6100e-003	0.0000	79.7532	79.7532	5.2000e-003	0.0000	79.8832

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0284	0.2921	0.2438	3.8000e-004		0.0172	0.0172		0.0159	0.0159	0.0000	33.0200	33.0200	0.0107	0.0000	33.2869
Total	0.0284	0.2921	0.2438	3.8000e-004		0.0172	0.0172		0.0159	0.0159	0.0000	33.0200	33.0200	0.0107	0.0000	33.2869

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.8000e-003	0.0536	0.0145	1.3000e-004	3.1200e-003	2.5000e-004	3.3700e-003	9.0000e-004	2.4000e-004	1.1400e-003	0.0000	12.2971	12.2971	7.8000e-004	0.0000	12.3166
Worker	0.0136	0.0109	0.1209	3.3000e-004	0.0322	2.7000e-004	0.0325	8.5500e-003	2.5000e-004	8.8000e-003	0.0000	29.9971	29.9971	9.5000e-004	0.0000	30.0207
Total	0.0154	0.0646	0.1354	4.6000e-004	0.0353	5.2000e-004	0.0358	9.4500e-003	4.9000e-004	9.9400e-003	0.0000	42.2942	42.2942	1.7300e-003	0.0000	42.3373

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					

Off-Road	0.0284	0.2921	0.2438	3.8000e-004		0.0172	0.0172		0.0159	0.0159	0.0000	33.0199	33.0199	0.0107	0.0000	33.2869
Total	0.0284	0.2921	0.2438	3.8000e-004		0.0172	0.0172		0.0159	0.0159	0.0000	33.0199	33.0199	0.0107	0.0000	33.2869

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.8000e-003	0.0536	0.0145	1.3000e-004	2.1000e-003	2.5000e-004	2.3500e-003	6.5000e-004	2.4000e-004	8.9000e-004	0.0000	12.2971	12.2971	7.8000e-004	0.0000	12.3166
Worker	0.0136	0.0109	0.1209	3.3000e-004	0.0194	2.7000e-004	0.0196	5.4000e-003	2.5000e-004	5.6500e-003	0.0000	29.9971	29.9971	9.5000e-004	0.0000	30.0207
Total	0.0154	0.0646	0.1354	4.6000e-004	0.0215	5.2000e-004	0.0220	6.0500e-003	4.9000e-004	6.5400e-003	0.0000	42.2942	42.2942	1.7300e-003	0.0000	42.3373

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1011	1.0420	0.9479	1.4900e-003		0.0584	0.0584		0.0537	0.0537	0.0000	130.6071	130.6071	0.0422	0.0000	131.6631
Total	0.1011	1.0420	0.9479	1.4900e-003		0.0584	0.0584		0.0537	0.0537	0.0000	130.6071	130.6071	0.0422	0.0000	131.6631

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.0800e-003	0.1932	0.0524	5.0000e-004	0.0123	3.9000e-004	0.0127	3.5600e-003	3.8000e-004	3.9400e-003	0.0000	48.2517	48.2517	2.9600e-003	0.0000	48.3257
Worker	0.0500	0.0389	0.4392	1.2700e-003	0.1273	1.0500e-003	0.1283	0.0338	9.7000e-004	0.0348	0.0000	114.8578	114.8578	3.3800e-003	0.0000	114.9423
Total	0.0561	0.2321	0.4916	1.7700e-003	0.1396	1.4400e-003	0.1410	0.0374	1.3500e-003	0.0387	0.0000	163.1095	163.1095	6.3400e-003	0.0000	163.2680

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1011	1.0420	0.9479	1.4900e-003		0.0584	0.0584		0.0537	0.0537	0.0000	130.6069	130.6069	0.0422	0.0000	131.6630
Total	0.1011	1.0420	0.9479	1.4900e-003		0.0584	0.0584		0.0537	0.0537	0.0000	130.6069	130.6069	0.0422	0.0000	131.6630

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Worker	3.4100e-003	2.6500e-003	0.0300	9.0000e-005	8.6800e-003	7.0000e-005	8.7500e-003	2.3100e-003	7.0000e-005	2.3700e-003	0.0000	7.8322	7.8322	2.3000e-004	0.0000	7.8380
Total	3.4100e-003	2.6500e-003	0.0300	9.0000e-005	8.6800e-003	7.0000e-005	8.7500e-003	2.3100e-003	7.0000e-005	2.3700e-003	0.0000	7.8322	7.8322	2.3000e-004	0.0000	7.8380

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.0990					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.6300e-003	0.0672	0.0800	1.3000e-004		4.1400e-003	4.1400e-003		4.1400e-003	4.1400e-003	0.0000	11.2343	11.2343	7.7000e-004	0.0000	11.2536
Total	0.1086	0.0672	0.0800	1.3000e-004		4.1400e-003	4.1400e-003		4.1400e-003	4.1400e-003	0.0000	11.2343	11.2343	7.7000e-004	0.0000	11.2536

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.4100e-003	2.6500e-003	0.0300	9.0000e-005	5.2200e-003	7.0000e-005	5.2900e-003	1.4600e-003	7.0000e-005	1.5200e-003	0.0000	7.8322	7.8322	2.3000e-004	0.0000	7.8380
Total	3.4100e-003	2.6500e-003	0.0300	9.0000e-005	5.2200e-003	7.0000e-005	5.2900e-003	1.4600e-003	7.0000e-005	1.5200e-003	0.0000	7.8322	7.8322	2.3000e-004	0.0000	7.8380

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0913	0.4810	1.2603	4.6000e-003	0.3804	3.8500e-003	0.3842	0.1020	3.5900e-003	0.1055	0.0000	424.9919	424.9919	0.0219	0.0000	425.5382
Unmitigated	0.0913	0.4810	1.2603	4.6000e-003	0.3804	3.8500e-003	0.3842	0.1020	3.5900e-003	0.1055	0.0000	424.9919	424.9919	0.0219	0.0000	425.5382

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Congregate Care (Assisted Living)	306.88	246.40	273.28	1,002,122	1,002,122
Enclosed Parking with Elevator	0.00	0.00	0.00		
Total	306.88	246.40	273.28	1,002,122	1,002,122

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Congregate Care (Assisted Living)	14.70	5.90	8.70	40.00	19.00	41.00	86	11	3
Enclosed Parking with Elevator	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Congregate Care (Assisted Living)	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087
Enclosed Parking with Elevator	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.0272	294.0272	6.9400e-003	1.4400e-003	294.6290
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	294.0272	294.0272	6.9400e-003	1.4400e-003	294.6290
NaturalGas Mitigated	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147
NaturalGas Unmitigated	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Congregate Care (Assisted Living)	1.0323e+006	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Congregate Care (Assisted Living)	1.0323e+006	5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		5.5700e-003	0.0476	0.0202	3.0000e-004		3.8500e-003	3.8500e-003		3.8500e-003	3.8500e-003	0.0000	55.0873	55.0873	1.0600e-003	1.0100e-003	55.4147

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Congregate Care (Assisted Living)	443529	247.0286	5.8300e-003	1.2100e-003	247.5341
Enclosed Parking with Elevator	84384	46.9986	1.1100e-003	2.3000e-004	47.0948
Total		294.0272	6.9400e-003	1.4400e-003	294.6290

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
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Land Use	kWh/yr	MT/yr			
Congregate Care (Assisted Living)	443529	247.0286	5.8300e-003	1.2100e-003	247.5341
Enclosed Parking with Elevator	84384	46.9986	1.1100e-003	2.3000e-004	47.0948
Total		294.0272	6.9400e-003	1.4400e-003	294.6290

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332
Unmitigated	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332

6.2 Area by SubCategory

Unmitigated

[illegible]

Consumer Products	0.1129					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0350	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332
Total	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	9.9000e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.1129					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0350	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332
Total	0.1578	0.0133	1.1567	6.0000e-005		6.3900e-003	6.3900e-003		6.3900e-003	6.3900e-003	0.0000	1.8876	1.8876	1.8200e-003	0.0000	1.9332

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			

Mitigated	83.7030	0.2397	6.0100e-003	91.4872
Unmitigated	83.7030	0.2397	6.0100e-003	91.4872

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Congregate Care (Assisted Living)	7.29725 / 4.60044	83.7030	0.2397	6.0100e-003	91.4872
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		83.7030	0.2397	6.0100e-003	91.4872

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Congregate Care (Assisted Living)	7.29725 / 4.60044	83.7030	0.2397	6.0100e-003	91.4872
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		83.7030	0.2397	6.0100e-003	91.4872

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	20.7457	1.2260	0.0000	51.3965
Unmitigated	20.7457	1.2260	0.0000	51.3965

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Congregate Care (Assisted Living)	102.2	20.7457	1.2260	0.0000	51.3965
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		20.7457	1.2260	0.0000	51.3965

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Congregate Care (Assisted Living)	102.2	20.7457	1.2260	0.0000	51.3965
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		20.7457	1.2260	0.0000	51.3965

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

825 South Holt Avenue Future - Los Angeles-South Coast County, Winter

825 South Holt Avenue Future
Los Angeles-South Coast County, Winter

1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	36.00	Space	0.00	14,400.00	0
Congregate Care (Assisted Living)	112.00	Dwelling Unit	0.41	30,996.00	112

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2022
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MW hr)	1227.89	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Developer information

Construction Phase -

Trips and VMT - Assumes 10CY capacity per haul truck, 30-mile distance to landfill

Demolition - Assumes 4,718 CY of buildings demolished @ 400 lb/CY = 944 tons

Grading - Assumes entire site excavated to 21.25 feet in depth

Vehicle Trips - ITE 9th Edition

Woodstoves - Developer information

Construction Off-road Equipment Mitigation - Assumes SCAQMD Rule 403 control efficiencies

Table Name	Column Name	Default Value	New Value
tblConstDustMitigation	CleanPavedRoadPercentReduction	0	46
tblConstructionPhase	NumDays	5.00	88.00
tblConstructionPhase	NumDays	100.00	327.00
tblConstructionPhase	NumDays	10.00	23.00
tblConstructionPhase	NumDays	2.00	22.00
tblConstructionPhase	NumDays	1.00	21.00
tblFireplaces	NumberGas	95.20	0.00
tblFireplaces	NumberNoFireplace	11.20	115.00
tblFireplaces	NumberWood	5.60	0.00
tblGrading	AcresOfGrading	0.00	0.41
tblGrading	AcresOfGrading	10.50	0.50
tblGrading	MaterialExported	0.00	14,215.00
tblLandUse	LandUseSquareFeet	112,000.00	30,996.00
tblLandUse	LotAcreage	0.32	0.00
tblLandUse	LotAcreage	7.00	0.41
tblLandUse	Population	320.00	112.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	1,777.00	1,421.00
tblTripsAndVMT	VendorTripNumber	14.00	15.00
tblTripsAndVMT	WorkerTripNumber	87.00	89.00
tblTripsAndVMT	WorkerTripNumber	17.00	18.00
tblVehicleTrips	HO_TTP	40.60	41.00
tblVehicleTrips	HS_TTP	19.20	19.00
tblVehicleTrips	HW_TTP	40.20	40.00
tblWoodstoves	NumberCatalytic	5.60	0.00
tblWoodstoves	NumberNoncatalytic	5.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.7238	33.1433	14.0555	0.0853	2.6507	0.5566	3.2073	0.9207	0.5312	1.4519	0.0000	9,082.2616	9,082.2616	0.7453	0.0000	9,100.8946
2021	3.8014	11.3141	13.4427	0.0296	1.2920	0.5544	1.8464	0.3448	0.5177	0.8625	0.0000	2,932.9908	2,932.9908	0.4358	0.0000	2,943.8849
Maximum	3.8014	33.1433	14.0555	0.0853	2.6507	0.5566	3.2073	0.9207	0.5312	1.4519	0.0000	9,082.2616	9,082.2616	0.7453	0.0000	9,100.8946

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.7238	33.1433	14.0555	0.0853	1.4845	0.5566	2.0411	0.4963	0.5312	1.0275	0.0000	9,082.2616	9,082.2616	0.7453	0.0000	9,100.8946
2021	3.8014	11.3141	13.4427	0.0296	0.7823	0.5544	1.3366	0.2197	0.5177	0.7374	0.0000	2,932.9908	2,932.9908	0.4358	0.0000	2,943.8849
Maximum	3.8014	33.1433	14.0555	0.0853	1.4845	0.5566	2.0411	0.4963	0.5312	1.0275	0.0000	9,082.2616	9,082.2616	0.7453	0.0000	9,100.8946

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	42.51	0.00	33.16	43.42	0.00	23.74	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Energy	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Mobile	0.5369	2.7135	7.1369	0.0261	2.2286	0.0222	2.2508	0.5964	0.0207	0.6171		2,654.7540	2,654.7540	0.1390		2,658.2279
Total	1.5202	3.0808	16.5016	0.0282	2.2286	0.0944	2.3229	0.5964	0.0929	0.6893	0.0000	3,004.1306	3,004.1306	0.1614	6.1000e-003	3,009.9835

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Energy	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Mobile	0.5369	2.7135	7.1369	0.0261	2.2286	0.0222	2.2508	0.5964	0.0207	0.6171		2,654.7540	2,654.7540	0.1390		2,658.2279
Total	1.5202	3.0808	16.5016	0.0282	2.2286	0.0944	2.3229	0.5964	0.0929	0.6893	0.0000	3,004.1306	3,004.1306	0.1614	6.1000e-003	3,009.9835

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/1/2020	7/31/2020	5	23	
2	Site Preparation	Site Preparation	8/3/2020	8/31/2020	5	21	
3	Grading	Grading	9/1/2020	9/30/2020	5	22	
4	Building Construction	Building Construction	10/1/2020	12/31/2021	5	327	
5	Architectural Coating	Architectural Coating	9/1/2021	12/31/2021	5	88	

Acres of Grading (Site Preparation Phase): 0.5**Acres of Grading (Grading Phase): 0.41****Acres of Paving: 0****Residential Indoor: 62,767; Residential Outdoor: 20,922; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 864****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Rubber Tired Dozers	1	1.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	4	10.00	0.00	5.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	1,421.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	89.00	15.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Replace Ground Cover

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0497	0.0000	0.0497	7.5200e-003	0.0000	7.5200e-003			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457		1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.0497	0.4672	0.5169	7.5200e-003	0.4457	0.4532		1,147.2352	1,147.2352	0.2169		1,152.6578

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	2.7100e-003	0.0849	0.0203	2.4000e-004	5.7000e-003	3.0000e-004	6.0000e-003	1.5600e-003	2.8000e-004	1.8500e-003		26.3339	26.3339	1.7700e-003		26.3781
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		110.7420	110.7420	3.4900e-003		110.8293
Total	0.0538	0.1212	0.4213	1.3500e-003	0.1175	1.2300e-003	0.1187	0.0312	1.1400e-003	0.0324		137.0760	137.0760	5.2600e-003		137.2074

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0184	0.0000	0.0184	2.7900e-003	0.0000	2.7900e-003			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.0184	0.4672	0.4856	2.7900e-003	0.4457	0.4485	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.7100e-003	0.0849	0.0203	2.4000e-004	3.7200e-003	3.0000e-004	4.0100e-003	1.0800e-003	2.8000e-004	1.3600e-003		26.3339	26.3339	1.7700e-003		26.3781
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.0671	9.3000e-004	0.0680	0.0187	8.6000e-004	0.0195		110.7420	110.7420	3.4900e-003		110.8293

Total	0.0538	0.1212	0.4213	1.3500e-003	0.0708	1.2300e-003	0.0720	0.0198	1.1400e-003	0.0209		137.0760	137.0760	5.2600e-003		137.2074
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3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0253	0.0000	0.0253	2.7300e-003	0.0000	2.7300e-003			0.0000			0.0000
Off-Road	0.6853	8.4307	4.0942	9.7400e-003		0.3353	0.3353		0.3085	0.3085		943.4872	943.4872	0.3051		951.1158
Total	0.6853	8.4307	4.0942	9.7400e-003	0.0253	0.3353	0.3606	2.7300e-003	0.3085	0.3113		943.4872	943.4872	0.3051		951.1158

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0256	0.0181	0.2005	5.6000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		55.3710	55.3710	1.7500e-003		55.4147
Total	0.0256	0.0181	0.2005	5.6000e-004	0.0559	4.7000e-004	0.0564	0.0148	4.3000e-004	0.0153		55.3710	55.3710	1.7500e-003		55.4147

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					9.3600e-003	0.0000	9.3600e-003	1.0100e-003	0.0000	1.0100e-003			0.0000			0.0000
Off-Road	0.6853	8.4307	4.0942	9.7400e-003		0.3353	0.3353		0.3085	0.3085	0.0000	943.4872	943.4872	0.3051		951.1158
Total	0.6853	8.4307	4.0942	9.7400e-003	9.3600e-003	0.3353	0.3447	1.0100e-003	0.3085	0.3095	0.0000	943.4872	943.4872	0.3051		951.1158

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0256	0.0181	0.2005	5.6000e-004	0.0335	4.7000e-004	0.0340	9.3400e-003	4.3000e-004	9.7700e-003		55.3710	55.3710	1.7500e-003		55.4147
Total	0.0256	0.0181	0.2005	5.6000e-004	0.0335	4.7000e-004	0.0340	9.3400e-003	4.3000e-004	9.7700e-003		55.3710	55.3710	1.7500e-003		55.4147

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Fugitive Dust					0.8456	0.0000	0.8456	0.4270	0.0000	0.4270			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457		1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.8456	0.4672	1.3128	0.4270	0.4457	0.8727		1,147.2352	1,147.2352	0.2169		1,152.6578

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.8054	25.2342	6.0320	0.0722	1.6933	0.0885	1.7818	0.4641	0.0846	0.5487		7,824.2844	7,824.2844	0.5249		7,837.4075
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		110.7420	110.7420	3.4900e-003		110.8293
Total	0.8565	25.2705	6.4330	0.0733	1.8051	0.0894	1.8945	0.4937	0.0855	0.5792		7,935.0264	7,935.0264	0.5284		7,948.2368

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.3133	0.0000	0.3133	0.1582	0.0000	0.1582			0.0000			0.0000
Off-Road	0.8674	7.8729	7.6226	0.0120		0.4672	0.4672		0.4457	0.4457	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578
Total	0.8674	7.8729	7.6226	0.0120	0.3133	0.4672	0.7805	0.1582	0.4457	0.6039	0.0000	1,147.2352	1,147.2352	0.2169		1,152.6578

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.8054	25.2342	6.0320	0.0722	1.1041	0.0885	1.1926	0.3195	0.0846	0.4041		7,824.2844	7,824.2844	0.5249		7,837.4075
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.0671	9.3000e-004	0.0680	0.0187	8.6000e-004	0.0195		110.7420	110.7420	3.4900e-003		110.8293
Total	0.8565	25.2705	6.4330	0.0733	1.1712	0.0894	1.2606	0.3381	0.0855	0.4236		7,935.0264	7,935.0264	0.5284		7,948.2368

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962
Total	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806		1,102.9781	1,102.9781	0.3567		1,111.8962

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
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Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0558	1.5953	0.4611	3.7900e-003	0.0960	7.6300e-003	0.1037	0.0277	7.3000e-003	0.0350		404.1736	404.1736	0.0270		404.8493
Worker	0.4548	0.3226	3.5690	9.9000e-003	0.9948	8.3200e-003	1.0031	0.2638	7.6600e-003	0.2715		985.6041	985.6041	0.0311		986.3808
Total	0.5106	1.9179	4.0301	0.0137	1.0908	0.0160	1.1068	0.2915	0.0150	0.3064		1,389.7777	1,389.7777	0.0581		1,391.2301

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962
Total	0.8617	8.8523	7.3875	0.0114		0.5224	0.5224		0.4806	0.4806	0.0000	1,102.9781	1,102.9781	0.3567		1,111.8962

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0558	1.5953	0.4611	3.7900e-003	0.0646	7.6300e-003	0.0722	0.0199	7.3000e-003	0.0272		404.1736	404.1736	0.0270		404.8493
Worker	0.4548	0.3226	3.5690	9.9000e-003	0.5970	8.3200e-003	0.6053	0.1662	7.6600e-003	0.1738		985.6041	985.6041	0.0311		986.3808

Total	0.5106	1.9179	4.0301	0.0137	0.6615	0.0160	0.6775	0.1861	0.0150	0.2011		1,389.7777	1,389.7777	0.0581		1,391.2301
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3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117		1,103.2158	1,103.2158	0.3568		1,112.1358

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0479	1.4533	0.4212	3.7500e-003	0.0960	3.0700e-003	0.0991	0.0277	2.9400e-003	0.0306		401.0183	401.0183	0.0259		401.6655
Worker	0.4244	0.2903	3.2775	9.5800e-003	0.9948	8.0400e-003	1.0029	0.2638	7.4000e-003	0.2712		954.3035	954.3035	0.0281		955.0055
Total	0.4722	1.7436	3.6986	0.0133	1.0908	0.0111	1.1020	0.2915	0.0103	0.3018		1,355.3218	1,355.3218	0.0540		1,356.6710

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358
Total	0.7750	7.9850	7.2637	0.0114		0.4475	0.4475		0.4117	0.4117	0.0000	1,103.2158	1,103.2158	0.3568		1,112.1358

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0479	1.4533	0.4212	3.7500e-003	0.0646	3.0700e-003	0.0676	0.0199	2.9400e-003	0.0229		401.0183	401.0183	0.0259		401.6655
Worker	0.4244	0.2903	3.2775	9.5800e-003	0.5970	8.0400e-003	0.6050	0.1662	7.4000e-003	0.1736		954.3035	954.3035	0.0281		955.0055
Total	0.4722	1.7436	3.6986	0.0133	0.6615	0.0111	0.6726	0.1861	0.0103	0.1964		1,355.3218	1,355.3218	0.0540		1,356.6710

3.6 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					

Archit. Coating	2.2495					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309
Total	2.4684	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	2.2495					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2189	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309
Total	2.4684	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941	0.0000	281.4481	281.4481	0.0193		281.9309

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.1207	1.6300e-003	0.1224	0.0336	1.5000e-003	0.0351		193.0052	193.0052	5.6800e-003		193.1472
Total	0.0858	0.0587	0.6629	1.9400e-003	0.1207	1.6300e-003	0.1224	0.0336	1.5000e-003	0.0351		193.0052	193.0052	5.6800e-003		193.1472

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.5369	2.7135	7.1369	0.0261	2.2286	0.0222	2.2508	0.5964	0.0207	0.6171		2,654.7540	2,654.7540	0.1390		2,658.2279
Unmitigated	0.5369	2.7135	7.1369	0.0261	2.2286	0.0222	2.2508	0.5964	0.0207	0.6171		2,654.7540	2,654.7540	0.1390		2,658.2279

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Congregate Care (Assisted Living)	306.88	246.40	273.28	1,002,122	1,002,122
Enclosed Parking with Elevator	0.00	0.00	0.00		
Total	306.88	246.40	273.28	1,002,122	1,002,122

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Congregate Care (Assisted Living)	14.70	5.90	8.70	40.00	19.00	41.00	86	11	3
Enclosed Parking with Elevator	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Congregate Care (Assisted Living)	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087
Enclosed Parking with Elevator	0.54650	0.04496	0.20401	0.12035	0.01574	0.00619	0.02013	0.03067	0.00251	0.00220	0.00514	0.00068	0.00087

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
NaturalGas Unmitigated	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Congregate Care (Assisted Living)	2828.21	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Congregate Care (Assisted Living)	2.82821	0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0305	0.2606	0.1109	1.6600e-003		0.0211	0.0211		0.0211	0.0211		332.7308	332.7308	6.3800e-003	6.1000e-003	334.7080

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476
Unmitigated	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0542					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.6188					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2797	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511		16.6457	16.6457	0.0161		17.0476
Total	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0542					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.6188					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.2797	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511		16.6457	16.6457	0.0161		17.0476
Total	0.9528	0.1067	9.2538	4.9000e-004		0.0511	0.0511		0.0511	0.0511	0.0000	16.6457	16.6457	0.0161	0.0000	17.0476

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Communication from Public

Name: Seth Wulkan

Date Submitted: 11/29/2021 09:59 AM

Council File No: 21-0593-S1

Comments for Public Posting: Please find attached a revised Class 32 memorandum prepared by CAJA for the 825 Holt Avenue Eldercare Project. File 7 of 7.
(Please note: These files are in addition to the previous 20.)



PHASE 1: HISTORICAL RESOURCE ASSESSMENT REPORT

825-837 S Holt Avenue, Los Angeles
June 2020

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-3816
Telephone 626 793 2400, Facsimile 626 793 2401
www.historicresourcesgroup.com

PREPARED FOR

The Panorama Group, Inc.
8665 Wilshire Blvd., Suite 208
Beverly Hills, CA 90211
Attn: Daniel Kianmahd, Principal

PHASE 1: HISTORICAL RESOURCE ASSESSMENT REPORT

825-837 S Holt Avenue, Los Angeles

HISTORIC RESOURCES GROUP

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Appendix C: Sanborn Fire Insurance Maps

Appendix D: Tract Map

Appendix E: Resumes of Authors/Contributors

1.0 EXECUTIVE SUMMARY

This report evaluates the multi-family residences at 825-827, 829-831, and 835-837 S. Holt Avenue (the “Subject Properties”) in the City of Los Angeles, California for potential historic significance. These parcels are located in the Wilshire Community Plan Area (CPA), which was surveyed as part of SurveyLA, the Los Angeles citywide historic resources survey, in 2014.¹ No building on any of these parcels was identified as a potential historical resource as part of that study. The properties are re-evaluated in this report based on an observation of existing conditions, primary and secondary source research related to the history of the property, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument. A site visit was conducted on April 29, 2020. Based on this analysis, we concur with the survey finding that these three properties are not eligible for historic designation at the federal, state, or local levels.

2.0 PROJECT LOCATION

825-827, 829-831, and 835-837 S. Holt Avenue are three separate, contiguous parcels located in the Wilshire CPA of the City of Los Angeles. The parcels are located on the west side of S. Holt Avenue, situated south of Gregory Way which bounds the City of Beverly Hills. A location map is included in Figure 1; a site map is included in Figure 2.

¹ City of Los Angeles, Department of City Planning, Office of Historic Resources, *Historic Resources Survey Report: Wilshire Community Plan Area*, prepared by Architectural Resources Group, Inc., January 2015.

FIGURE 1: LOCATION MAP

Subject Properties outlined in red.

FIGURE 2: SITE MAP

Site plan with addresses noted. Subject Properties outlined in red; parcel boundaries indicated by dashed lines.

3.0 ASSESSMENT METHODOLOGY

825-827, 829-831, and 835-837 S. Holt Avenue were evaluated using integrity thresholds and eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument. The field methods and analysis are based on guidance from the National Park Service, the California Office of Historic Preservation, and the City of Los Angeles Office of Historic Resources for evaluating potential historic resources; and an identification of physical features and historic integrity ascertained during the site visit and through building records.

This report was prepared using sources related to the history and development of the Subject Properties. The following sources were consulted:

- Building permits
- Historic newspaper articles
- Historic aerial photography
- Sanborn Fire Insurance maps
- Other primary and secondary sources relevant to the history of the site
- Survey Report for the Wilshire CPA for description and survey findings of the area

Research, evaluation, field inspection, and analysis were performed by Paul Travis, AICP, Principal; Morgan Quirk, Associate Preservation Planner. Both are qualified professionals who meet the *Secretary of the Interior's Professional Qualification Standards*.

4.0 REGULATORY FRAMEWORK

Historic resources may be designated at the federal, state, and local levels. Current landmark designations available for properties located in Los Angeles include listing in the National Register of Historic Places, the California Register of Historical Resources, and as City of Los Angeles Historic-Cultural Monuments. While all designation programs place emphasis on architectural character, they also use basic criteria relating to a property's place in important events or patterns of development, association with important personages, and architectural significance. Additionally, a property may be identified as a contributor to an eligible or designated historic district. Local historic districts designated in Los Angeles are known as City of Los Angeles Historic Preservation Overlay Zones.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.² The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of a historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

² 36CFR60, Section 60.2.

D. That have yielded, or may be likely to yield, information important in prehistory or history.³

Integrity

In addition to meeting any or all of the National Register designation criteria listed above, properties nominated must also possess historic integrity. Historic integrity is the ability of a property to convey its significance and is defined as “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”⁴

The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event took place.
- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.
- *Setting* is the physical environment of a historic property.
- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- *Feeling* is a property’s expression of the aesthetic or historic sense of a particular period of time.
- *Association* is the direct link between an important historic event or person and a historic property.⁵

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.⁶

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

³ 36CFR60, Section 60.3. Criterion D addresses potential archaeological resources which is outside the scope of this study.

⁴ U.S. Department of the Interior, “National Register Bulletin 16: How to Complete the National Register Registration Form” (Washington, D.C.: National Park Service, 1997).

⁵ U.S. Department of the Interior, “National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation” (Washington D.C.: National Park Service, 1995).

⁶ California PRC, Section 5023.1(a).

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.⁷

For integrity purposes, resources eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. It is possible that resources lacking sufficient integrity for listing in the National Register may still be eligible for the California Register.⁸

City of Los Angeles Historic-Cultural Monuments

The City of Los Angeles Cultural Heritage Ordinance, first enacted in 1962 and updated in 2018, allows for the designation of buildings and sites as individual local landmarks in the City of Los Angeles. These landmarks are known as “Historic-Cultural Monuments.”

Section 22.171.7 of Article 1, Chapter 9, Division 22 of the City of Los Angeles Administrative Code defines a Historic-Cultural Monument as “any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles.” A proposed Monument may be designated by the City Council upon the recommendation of the Cultural Heritage Commission if it meets at least one of the following criteria:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

Designation as a Historic-Cultural Monument is “reserved for those places that have unique aesthetic, architectural, cultural or historic value to the City of Los Angeles.”⁹ For integrity purposes, resources eligible for local designation should retain enough of their historic character or appearance to convey the reasons for their significance.

⁷ Criterion 4 addresses potential archaeological resources; therefore, it is not analyzed as part of this report.

⁸ State of California Department of Parks and Recreation, “California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison,” Sacramento, CA: Office of Historic Preservation, 2011.

⁹ City of Los Angeles, Department of City Planning, Office of Historic Resources, “Office of Historic Resources Info Brief: What Makes a Resource Significant?,” <https://planning.lacity.org/odocument/fcd76b35-7140-48ef-ad50-2506f270d0d8/Info%20Brief%20What%20Makes%20a%20Resource%20Significant.pdf> (accessed March 2020).

City of Los Angeles Historic Preservation Overlay Zones (HPOZ)

The City of Los Angeles Historic Preservation Overlay Zone Ordinance, enacted in 1979 and amended in 2018, allows for the designation of historic districts as “Historic Preservation Overlay Zones” (HPOZs). Section 12.20.3 of Article 2, Chapter 1, of the City of Los Angeles Municipal Code (LAMC) states that the purpose of establishing HPOZs is to:

1. Protect and enhance the use of buildings, structures, natural features, and areas, which are reminders of the City’s history, or which are unique and irreplaceable assets to the City and its neighborhoods, or which are worthy examples of past architectural styles;
2. Develop and maintain the appropriate settings and environment to preserve these buildings, structures, landscaping, natural features, and areas;
3. Enhance property values, stabilize neighborhoods and/or communities, render property eligible for financial benefits, and promote tourist trade and interest;
4. Foster public appreciation of the beauty of the City, of the accomplishments of its past as reflected through its buildings, structures, landscaping, natural features, and areas;
5. Promote education by preserving and encouraging interest in cultural, social, economic, political and architectural phases of its history;
6. Promote the involvement of all aspects of the City’s diverse neighborhoods in the historic preservation process; and
7. Ensure that all procedures comply with the California Environmental Quality Act (CEQA).¹⁰

¹⁰ Los Angeles Municipal Code (LAMC) Article 2, Chapter 1; Amended by Ordinance 184,903, effective 6-17-17.

5.0 SUMMARY OF PREVIOUS EVALUATIONS/DESIGNATIONS

SurveyLA

SurveyLA is the City of Los Angeles' citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California State Office of Historic Preservation, and overseen by the City's Office of Historic Resources. Properties surveyed as part of SurveyLA were evaluated for eligibility for listing in the National Register of Historic Places, the California Register of Historical Resources, and for designation as City of Los Angeles Historic-Cultural Monuments. The Subject Property is located in the Wilshire CPA, which was surveyed in 2014. The Subject Property was not identified as a potential historical resource as a result of that study.

Historical Resources Inventory

The California Office of Historic Preservation (OHP) maintains the California Historical Resources Inventory (HRI), a database of previously evaluated resources throughout the state.¹¹ The Subject Properties are not listed in the California Historical Resources Inventory (HRI).

¹¹ California Historical Resources Inventory, August 15, 2011.

6.0 HISTORY AND DESCRIPTION OF THE SURROUNDING AREA

Wilshire Community Plan Area ¹²

The Subject Properties at 825-837 S. Holt Avenue are located in the Pico-Robertson neighborhood, situated in the western portion of the Wilshire CPA in the City of Los Angeles, and south of the City of Beverly Hills. The Wilshire CPA is bounded generally by Rosewood Avenue and Melrose Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the city's irregular western boundary to the west.

In 1887, Henry Gaylord Wilshire, an entrepreneur from Ohio, purchased 35 acres west of present-day MacArthur Park in partnership with his brother, William. They subdivided the land in 1895, envisioning a luxurious subdivision anchored by a wide, graveled avenue (present-day Wilshire Boulevard) that would connect present-day MacArthur and Lafayette Parks, and arranged a deal to build an intersecting boulevard (present-day Lafayette Park Place) if the City donated the land. These streets became the heart of a subdivision with generous lots, palm trees, and views of MacArthur Park and downtown Los Angeles. In the 1890s and 1900s, the eastern portion of the Wilshire neighborhood saw predominately residential development.

The Wilshire neighborhood developed steadily throughout the 1910s and 1920s. The majority of the neighborhood constituted residential development, ranging from single-family houses to large apartment houses. The apartment house was particularly commonplace in the Wilshire neighborhood, playing the important role of providing temporary and long-term housing at a relatively low cost to residents of the rapidly growing city. Large apartment buildings, resort hotels, and commercial buildings also rose throughout the district. Wilshire became known as Los Angeles' playground: recreational facilities were established throughout the neighborhood, and local dining and dancing institutions lured people to the area. Large parking lots, service stations, automobile dealerships, drive-up markets, and drive-up coffee shops soon sprang up throughout the district. Appropriately for a car-centric boulevard, Wilshire housed a number of extravagant automobile dealerships with eye-catching signs.

In the early 1920s, A.W. Ross began buying up land along Wilshire Boulevard in an area most thought of as too distant from Los Angeles, between La Brea Avenue and Fairfax Avenue. He envisioned a destination shopping district that would lure customers from Beverly Hills as well as Hollywood and downtown Los Angeles, and encouraged the construction of architecturally distinctive commercial buildings. Ross's development would become known as Miracle Mile.

By the mid-1920s, Wilshire Boulevard was one of the most heavily traveled streets in Los Angeles, serving as the most direct east-west route through the city. Traffic was bad, and only got worse as the city came to depend more and more on the automobile over the streetcar. City officials were aware of the problems facing an increasingly car-dependent public, and it was partly thanks to the Wilshire traffic situation that Los Angeles adopted traffic control measures still in use today, like crosswalks, lane lines, and timed lights.

Beyond Wilshire itself, other major east-west streets in the Survey Area like Pico Boulevard, 10th Street (now Olympic), and West Third Street were traversed by streetcar lines and enabled rapid

¹² History of the Wilshire neighborhood adapted from City of Los Angeles, Department of City Planning, Office of Historic Resources, *Historic Resources Survey Report: Wilshire Community Plan Area*, prepared by Architectural Resources Group, January 2015.

residential and commercial development in the first few decades of the twentieth century. Development along these medium-sized commercial corridors was smaller and more pedestrian-oriented in scale, comprising small retailers, restaurants, and offices rather than the massive department stores and hotels of Wilshire Boulevard. The area's commercial strips had sidewalks, low-scale streetlights, and projecting signage to attract passersby, with many of their corners marked by prominent two-story, mixed-use buildings. Even smaller commercial corridors like the one along Larchmont Boulevard thrived, becoming crucial anchors for the surrounding residential areas.

After steady growth through the 1930s on Miracle Mile and beyond, the area saw little commercial development during World War II. In the postwar years, however, Wilshire Boulevard's luxurious department stores, clubs and restaurants were joined by large office buildings housing high-profile corporations. New York developer Norman Tishman was the first to erect large office buildings along Wilshire, and many others followed. Wilshire Boulevard quickly gained a new reputation as a business center.

Wilshire's reputation as a world-class business center continued through the 1970s, with the area seeing dozens of new high-rise corporate buildings. It began to wane in the 1980s, as corporations departed the area for the cheaper and less congested San Fernando Valley and Westside of Los Angeles. The district's prospects looked bleak until an infusion of capital from Korean investors arrived, resulting in a revival. Although parts of the area experienced periods of economic downturn in the 1980s and 1990s, the Wilshire CPA as a whole remains a strong and diverse commercial center in Los Angeles.

Pico-Robertson

The Subject Properties are located in the Pico-Robertson neighborhood, which is in the far southwest corner of the Wilshire CPA and extends west outside the CPA's borders into Beverly Hills and the West Los Angeles CPA. Within the Wilshire CPA, the neighborhood is bounded roughly by the Carthay neighborhoods, Fairfax Avenue, 18th Street, and Beverly Hills. The residential neighborhoods of this area followed the same pattern as those in the adjoining neighborhoods of Mid-Wilshire and Beverly-Fairfax: they were subdivided in the 1920s from larger tracts of land, and largely developed through the 1920s and 1930s. The neighborhood was originally grazing and agricultural land, and later saw substantial oil exploration activity associated with the Salt Lake Oil Field and its smaller southern neighbor, the Los Angeles Oil Field. Both single-family and multi-family residences were common in Pico-Robertson, primarily designed in a mix of Period Revival styles.

The Pico-Robertson neighborhood is best known as an important locus of the local Jewish community, but it did not fully attain that status until after World War II. Unlike the residential and commercial districts of Beverly-Fairfax, Pico-Robertson did not have a substantial Jewish population during its initial development in the 1920s and 1930s. But during the 1950s, Pico-Robertson began to experience the same influx of new Jewish American residents that the Beverly-Fairfax neighborhood had. Fairfax Avenue and Beverly Boulevard remained the heart of Jewish institutional and commercial life for a number of years. Starting in the 1980s, Pico-Robertson began to see a new migration of members of the Orthodox community, and institutions and businesses followed; Pico Boulevard at Robertson Boulevard became the best-known hub of Jewish life in Los Angeles.

7.0 DESCRIPTION OF EVALUATED RESOURCES

Current Setting

The properties at 825-837 S. Holt Avenue are located on the west side of S. Holt Avenue, between Gregory Way and Chalmers Drive in the Wilshire CPA of the City of Los Angeles. 825-827 S. Holt Avenue is flanked to the north by a four-story apartment complex with parking beneath; to the west by a two-story multi-family residence; and to the south by 829-831 S. Holt Avenue. 829-831 S. Holt Avenue is flanked to the north by 825-827 S. Holt Avenue; to the west by a two-story multi-family residence; and to the south by 835-837 S. Holt Avenue. 835-837 S. Holt Avenue is flanked to the north by 829-831 S. Holt Avenue; to the west by a two-story multi-family residence with parking beneath; and to the south by a three-story apartment complex. The Olympic Boulevard Multi-Family Residential Historic District is located one block south of the Subject Properties.¹³

The buildings are set back, with mature landscaping, including a privacy hedge and metal security gate at 835-837 S. Holt Avenue. All three properties include a side concrete driveway leading to a rear surface parking pad and detached garage. The properties at 825-827 and 829-831 S. Holt Avenue have detached four-car garages with rectangular plans and simple massing, while the property at 835-837 S. Holt Avenue has a three-car garage. The three separate garages have flat roofs with composition roofing; parapets and clay barrel tile coping; and exterior walls clad in textured cement plaster.

Architectural Description

825-827 S. Holt Avenue

The multi-family residence at 825-827 S. Holt Avenue (APN 4333-024-008) is located on lot 40 of Tract No. 4666. The two-story Spanish Colonial Revival duplex is roughly rectangular in plan, with simple massing, and asymmetrical composition. It has a low-pitched, side gable roof on the east portion of the building that is clad in clay tile with slight eave overhangs, a cornice, and exposed rafter tails along part of the east (primary) façade. The remaining roof is flat and clad in composition roofing with parapets and clay barrel tile coping. A chimney is located towards the north portion of the roof and is clad in textured cement plaster. An exterior stair at the primary façade has prominent shaped stair walls and leads to a partial-width second-story balcony with a trabeated horizontal beam; metal security gate; and metal railing. There is a second-story overhang with outriggers along the east (primary) façade and a porte-cochère that flanks the north façade of the residence, with arcaded openings for automobile access to the rear surface lot. The exterior wall finishing consists of textured cement plaster. Fenestration consists of casement and fixed wood sash windows in the original wood frames, some of which are screened. Many windows have wide wood stucco molds and projecting sills; some have security grilles. There is a large fixed, wood sash focal window at the east (primary) façade. The primary entrance to the ground level unit is asymmetrically located on the east façade, and

¹³ The Olympic Boulevard Multi-Family Residential Historic District consists of two-story residences along the north side of Olympic Boulevard from just west of Shenandoah Street to Le Doux Road, and parcels along the south side of Olympic Boulevard from just east of Wooster Street to just east of Holt Avenue. The dominant period of development for the district is 1931 to 1954 with some 1980s and 1990s infill. The district mostly consists of two-story duplexes, triplexes and fourplexes, predominantly in the Spanish Colonial Revival, Late Chateausque or Minimal Traditional styles. Of the district's 42 properties, 76% contribute to its significance. It was identified in SurveyLA as eligible for listing in the National Register, California, Register, and at the local level as "an excellent example of a 1930s to 1950s multi-family residential neighborhood in the Wilshire area, as well as an excellent concentration of Period Revival style residences." (City of Los Angeles, Department of City Planning, *Historic Resources Survey Report: Wilshire Community Plan Area*, prepared by Architectural Resources Group, January 2015.)

consists of a single door sheltered beneath a porch with a large arched opening. It is accessed by a tile walkway and two low steps. A second and narrower arched opening leads to the ground floor porch on the south façade. The primary entrance to the upper unit is asymmetrically located on the east façade and consists of a single door, accessed by a stair with shaped stair walls, a metal security gate, and metal railing along the landing at the east façade. There is a secondary entrance to the upper unit asymmetrically located on the south façade, consisting of exterior stairs and a metal handrail.

829-831 S. Holt Avenue

The parcel at 829-831 S. Holt Avenue (APN 4333-024-009) is located on lot 41 of Tract No. 4666 and occupied by a two-story multi-family residence designed in the Spanish Colonial Revival style of architecture. The duplex is rectangular in plan, has simple massing, and is asymmetrical in composition. It has a flat roof clad in composition roofing with parapets and clay barrel tile coping. Low-pitched, side and cross gable roofs clad in clay tiles with slight eave overhangs are located along the east (primary) and south façades. There are exposed rafter tails along the east facade. A capped chimney is asymmetrically situated on the roof and clad in textured cement plaster. An exterior stair and metal handrail at the east (primary) façade leads to a covered landing accessed by an arched opening, continuing up to a partial-width second-story balcony with metal railing. The covered portion of the exterior stair includes decorative stucco vents on the east façade and is sheltered by a lower-leveled pent roof clad in clay tile. A second-story overhang with outriggers runs asymmetrically along the east (primary) façade and a porte-cochère is located on the north façade, with arcaded openings for automobile access to the rear surface lot. The exterior walls are clad in textured cement plaster. Fenestration consists of casement and fixed windows in the original wood frames, with wide wood stucco molds and projecting sills; some windows have security grilles and screens. There is a fixed rounded arch focal window asymmetrically placed at the east (primary) façade. The primary entrance to the ground level unit is asymmetrically located on the east façade, and consists of a single door sheltered beneath a porch. It is accessed by a concrete walkway and step. The primary entrance to the upper unit is asymmetrically located on the east façade and consists of a single door, accessed by a partially covered stair and covered landing with metal railing beneath a horizontal wood beam.

835-837 S. Holt Avenue

835-837 S. Holt Ave (APN 4333-024-010) is located on lot 42 of Tract No. 4666 and occupied by a two-story multi-family residence. The Spanish Colonial Revival duplex is two stories in height with a rectangular plan, simple massing, and asymmetrical composition. It has a low-pitched, side gable roof clad in clay tile with slight eave overhangs and exposed rafter tails along the east (primary) façade. The remaining roof is flat and clad in composition roofing with parapets and clay barrel tile coping. A capped chimney is located on the north edge of the roof and is clad in textured cement plaster. An exterior stair at the primary façade has prominent shaped stair walls capped with decorative ironwork that leads to a partial-width second-story balcony with low walls featuring decorative vents and carved wood porch supports along the primary facade. The second-story balcony is covered by wide overhangs and exposed rafters. The exterior wall finishing consists of textured cement plaster. Fenestration consists of fixed and casement windows in the original wood frames, with wide wood stucco molds and projecting sills; some windows feature decorative shutters. There is a bay window capped by a low-pitched angled roof situated on the east (primary) façade. The primary entrance to the ground level unit is asymmetrically located on the east façade, and consists of a single door sheltered beneath a

broad porch with prominent walls and a support pillar clad in textured cement plaster. It is accessed through a metal security gate and tile walkway found on both the east (primary) and north sides of a tall privacy hedge. The primary entrance to the upper unit is located on the east façade and consists of a single door, accessed by a tiled stair with shaped stair walls. A second-story deck and covered ground-floor porch are asymmetrically situated along the west façade, along with an exterior stairway leading to a secondary entrance to the upper unit. A driveway and automatic metal gate along the north façade give access to the rear parking pad and detached garage.

PHOTOGRAPHS OF EVALUATED RESOURCE (HISTORIC RESOURCES GROUP, APRIL 29, 2020)



825-827 S. Holt Avenue and adjacent apartment complex, view facing west.



825-827 S. Holt Avenue, view facing southwest.



Subject Properties, view facing southwest looking across S. Holt Avenue.



825-827 S. Holt Avenue, view facing west.



825-827 S. Holt Avenue, view facing northwest.



829-831 & 825-827 S. Holt Avenue, view facing west.



829-831 S. Holt Avenue, view facing southwest.



829-831 S. Holt Avenue, view facing west.



829-831 S. Holt Avenue, view facing west looking across S. Holt Avenue.



835-837 & 829-831 S. Holt Avenue, view facing west looking across S. Holt Avenue.



835-837 S. Holt Avenue, view facing southwest.



835-837 S. Holt Avenue, view facing west.



835-837 S. Holt Avenue and adjacent apartment complex, view facing west.



View facing north, looking down S. Holt Avenue toward Gregory Way.

8.0 SITE HISTORY

Construction History

The Subject Properties consist of three two-story duplexes situated on three separate, contiguous parcels. The duplexes were built in the Spanish Colonial Revival style of architecture by their owners in 1931 and 1937. They are located on lots 40, 41, and 42 of Tract No. 4666, a portion of the Whitworth Tract, which comprised of 93 residential lots and was subdivided in 1924 by the North American Bond and Mortgage Company.

825-827 S. Holt Avenue

C.E. Bowne was the owner and builder of the two-story, 36' x 54' wood-frame duplex located at 825-827 S. Holt Avenue on lot 40 of Tract No. 4666. A permit was issued on May 20, 1931 to construct the fifteen-room duplex with a brick chimney; stucco exterior finish; and tile and composition roofing for \$8,000.¹⁴ An additional permit was issued that day to construct a one story, 18' x 36' wood-frame private garage, with stucco exterior finish and tile and composition roofing.¹⁵ The new duplex was listed for sale in a 1931 *Los Angeles Times* advertisement, detailing features such as colored tile kitchens and in-unit heat.¹⁶

In 1953, stucco and wood timbers in the front stairway were removed and replaced due to termite damage.¹⁷ Following the 1994 Northridge earthquake, owner Davood Hedvat hired a contractor to epoxy a crack along a nonbearing retaining wall in the basement.¹⁸

829-831 S. Holt Avenue

On May 14, 1931, C.E. Bowne was issued a permit to build the two-story 36' x 54' wood-frame duplex located at 829-831 S. Holt Avenue on lot 41 of Tract No. 4666 for a cost of \$8,000. Like the duplex at 825-827 S. Holt Avenue, the building comprised of fifteen rooms and included a brick chimney, stucco exterior finish, and tile and composition roofing.¹⁹ Bowne also received a permit that same day to construct a one story, 18' x 36' wood-frame private garage, with stucco exterior finish and tile and composition roofing at the rear of the lot.²⁰ The "4 baths, 6 bedroom" duplex located near Beverly Hills was quickly listed for sale in a June 1931 *Los Angeles Times* advertisement for \$19,000.²¹

In 1947, interior remodeling consisted of replacing the floors and fixtures in two downstairs bathrooms due to fungus damage.

835-837 S. Holt Avenue

Owner and builder, Malcolm B. Morehart, was issued a permit on January 7, 1937 to construct a new two-story, 34' x 60' wood-frame duplex at 835-837 S. Holt Avenue on lot 42 of tract No. 4666. At a cost of \$8,400, the duplex included a brick chimney, stucco exterior finish, and

¹⁴ City of Los Angeles, Department of Building and Safety, Building Permit LA10497, May 20, 1931.

¹⁵ City of Los Angeles, Department of Building and Safety, Building Permit LA10498, May 20, 1931.

¹⁶ "Duplex," *Los Angeles Times*, September 20, 1931.

¹⁷ City of Los Angeles, Department of Building and Safety, Building Permit LA59841, June 10, 1953.

¹⁸ City of Los Angeles, Department of Building and Safety, Building Permit LA17407, April 21, 1994.

¹⁹ City of Los Angeles, Department of Building and Safety, Building Permit LA09998, May 14, 1931.

²⁰ City of Los Angeles, Department of Building and Safety, Building Permit LA09999, May 14, 1931.

²¹ "Duplex, Beautiful, 15 Rooms," *Los Angeles Times*, June 30, 1931.

tile roofing.²² A one story, 18' x 36' wood-frame detached garage, with stucco exterior finish and composition roofing was also constructed at the rear of the lot.²³ Two months later, Morehart hired a contractor to complete interior tiling.²⁴ By May 1937, the units in the duplex were available to rent for \$75 a month.²⁵

In 1970, owner and occupant M. Sehreibu hired contractor Tom McCain to wet sandblast the building.²⁶ Ten years later, the front porch was remodeled and extended under the ownership of Mr. and Mrs. Spillman.²⁷ A permit was issued to the Spillman couple in 1998, who hired Mar Vista Roofing Inc. to re-roof flat sections of the units.²⁸ Subsequent owner Wendy B. Wright added a 212 square foot walking deck to the second floor in 2011.²⁹

A summary of available building permits is included in Appendix A.

Spanish Colonial Revival Architecture³⁰

The three duplexes that comprise the Subject Properties are Spanish Colonial Revival in style. The Spanish Colonial Revival style was popularized by the Spanish-style buildings at the 1915 Panama California Exposition in San Diego, designed by Bertram Goodhue and Carleton Winslow, Sr. The buildings in San Diego provided a variety of Spanish forms, including the ornate *Churrigueresque*.

The Spanish Colonial Revival style became ubiquitous in 1920s Los Angeles. Most every building type made use of it, employing all forms of construction – wood frame, brick masonry, reinforced concrete, even adobe. Because of the stress on picturesquely assembled masses, the Spanish Colonial Revival was extremely flexible. It could vary in scale and use. Its only limitation was that it worked best in stand-alone buildings, where its three-dimensional nature could be shown. It was less successful as part of a dense streetscape, tight against neighboring buildings. For that it often employed a variation, the *Churrigueresque* style.

Advancing the Spanish Colonial Revival were publications by architects who had studied the historic structures of Mexico and the Mediterranean, in particular that of Andalusia. Typical was *Architectural Details: Spain and the Mediterranean*, published in 1926 by Richard Requa. It stressed the appropriateness of Mediterranean form for a climate such as Southern California and called out the elements of the style. In addition to expanses of unbroken white or pastel-colored walls and low-sloped red tile roofs, Requa noted the importance of enclosed outdoor spaces and the need for details such as wrought iron for balconies and for rejas, or window grilles.

The Spanish Colonial Revival was useful for multi-family housing. Picturesquely assembled massing together with flexible stucco-on-wood-frame construction made it adaptable to a variety

²² City of Los Angeles, Department of Building and Safety, Building Permit LA00626, January 7, 1937.

²³ City of Los Angeles, Department of Building and Safety, Building Permit LA00627, January 7, 1937.

²⁴ City of Los Angeles, Department of Building and Safety, Building Permit LA09215, March 24, 1937.

²⁵ "Brand New 6-Rm Upper Duplex," *Los Angeles Times*, May 23, 1937.

²⁶ City of Los Angeles, Department of Building and Safety, Building Permit LA15893, September 17, 1970.

²⁷ City of Los Angeles, Department of Building and Safety, Building Permit LA99882, March 19, 1980.

²⁸ City of Los Angeles, Department of Building and Safety, Building Permit 98016-30000-09817, May 26, 1998.

²⁹ City of Los Angeles, Department of Building and Safety, Building Permit 10014-20000-04344, March 10, 2011.

³⁰ Description of the Spanish Colonial Revival style excerpted and adapted from City of Los Angeles, Department of City Planning, Office of Historic Resources, "Context: Architecture and Engineering, 1850-1980; Theme: Mediterranean & Indigenous Revival Architecture, 1893-1948; Sub-theme: Spanish Colonial Revival, 1912-1942," *SurveyLA: Los Angeles Historic Resources Survey Project, Historic Context Statement*, November 2018.

of sizes and site conditions. The style was popular for duplexes, triplexes, and fourplexes as well as auto-oriented bungalow courts and traditional urban apartment houses. It also led to a new multi-family building type, the courtyard apartment building. The duplex and the triplex were the smallest of the multi-family forms and tried to fit the image of the single-family home. The duplex was the most common, either one-story side-by-side or two-story stacked. It typically sat on a lot that was the same size as that for a single-family structure, and its use of a side driveway provided the same rhythm to the streetscape. Only the larger bulk of the two-story stacked form, particularly seen from the side, gave away its multi-family character.

Duplex Property Type³¹

The Subject Properties are occupied by three duplexes constructed in 1931 and 1937. During the 1920s, Hollywood dramatically increased in density to meet burgeoning demand for housing. Bungalow courts, duplexes, and multi-story apartment buildings replaced many of the single-family homes that had originally characterized Hollywood.

One of the earliest types of apartment housing in Los Angeles was the duplex. Apartment houses, of which duplexes are a sub-type, are designed to maximize lot coverage, with little or no lot area land dedicated to useable open space; and are oriented toward the street, with architectural detailing concentrated on the street-facing façade. Apartment houses vary widely in terms of density, from one-story duplexes to high-rise luxury apartment towers. They can accommodate a variety of architectural styles, and therefore often reflect the dominant residential styles of the period in which they were constructed. Due to their versatility, apartment houses were built throughout the twentieth century and in nearly every part of Los Angeles.

There were several reasons that development of the duplex prevailed during the early days of multi-family development in the city. Chief among them was the fact that duplexes presented even the average homeowner with the opportunity to capitalize on the concurrent population and real estate booms. Composed of two separate dwelling units, the arrangement of the typical duplex allowed the homeowner to live in one unit while renting out the other, thus enabling the construction of both a residence and income property on a single lot. Duplexes were also appealing because their size and scale resembled that of the single-family homes with which they sometimes shared the block.

The similarity in scale and massing allowed duplexes to be designed in many of the same styles as were popular for single-family residences at the time, including the Craftsman style and various Period Revival styles. Duplexes of all kinds were built in large numbers for decades, and were classified as a distinct dwelling type by the Building Department well in to the 1920s. Part of what distinguished the development of the duplex was that it could be constructed anywhere, and individual examples were indeed built throughout the city. Today, examples of the dwelling type can be found citywide in areas of including Westlake, Wilshire, San Pedro, Echo Park, South and Southeast Los Angeles and others.

³¹ Description of the Duplex property type excerpted and adapted from City of Los Angeles, Department of City Planning, Office of Historic Resources, "Context: Residential Development and Suburbanization, 1880-1980; Theme: Multi-Family Residential Development, 1895-1970; Sub-theme: Apartment Houses, 1895-1970," *SurveyLA: Los Angeles Historic Resources Survey Project, Historic Context Statement*, December 2018.

Related Architects/Builders

Building permits were consulted to compile a list of architects and builders who performed work at the Subject Properties. Based on the available ownership information, research was conducted in primary and secondary sources to determine whether any architects or builders of the Subject Site may be historically significant. Available biographical information is included below.

FIGURE 3: SUMMARY OF ARCHITECTS/BUILDERS

DATE	ARCHITECT/BUILDER	DESCRIPTION OF WORK
825-827 S. Holt Avenue		
1931	C.E. Bowne	Construction of two-story, fifteen-room, wood-frame duplex; detached one-story garage
829-831 S. Holt Avenue		
1931	C.E. Bowne	Construction of two-story, fifteen-room, wood-frame duplex; detached one-story garage
835-837 S. Holt Avenue		
1937	M.B. Morehart	Construction of two-story, wood-frame duplex; detached one-story garage
1980	B. Graves/N. Breen	Remodel and front porch extension
1998	Mar Vista Roofing Inc.	Re-roof flat sections of units
2011	Golden Construction Services Inc.	Deck addition to second floor

C.E. Bowne (Owner/Builder—825-827 & 829-831 S. Holt Avenue)

C.E. Bowne was listed as the owner and builder of 825-827 and 829-831 S. Holt Avenue in 1931. He was also the owner and builder of a two-story, fifteen-room, wood-frame duplex at 819-821 S. Holt Avenue (demolished), immediately north of the Subject Properties.³² At the time of the three duplexes' construction, Bowne resided at 365 N. Spaulding Avenue #4 in the Beverly-Fairfax neighborhood of Los Angeles. No additional biographical information could be found after conducting research of primary and secondary sources, including city directories, federal census data, and newspaper archives.³³

Malcolm B. Morehart (Owner/Builder—835-837 S. Holt Avenue)

Malcom Morehart was listed as the owner and builder of 835-837 S. Holt Avenue in 1937. Morehart was born in 1891 in Mankato, Minnesota and married Sylvia Wilson of California in 1918 in Clark, Washington.³⁴ ³⁵ By 1920, he worked in real estate sales in Minnesota. By 1923, Morehart and his family moved to California where he worked as the Orange County district manager of the L.A. Lambert Oil Syndicate in 1923.³⁶ At the time of the duplex's construction,

³² City of Los Angeles, Department of Building and Safety, Building Permit LA04176, March 3, 1931.

³³ Research was also conducted for alternate spellings Boune, Boone, and Bawne.

³⁴ United States of America, Bureau of the Census, *Fourteenth Census of the United States*, 1920, (NARA microfilm publication T625, 2076 rolls), Records of the Bureau of the Census, Record Group 29, National Archives, Washington, D.C.

³⁵ *Washington State Archives*, Olympia, Washington: Washington State Archives.

³⁶ "The Big Gushers Are Our Neighbors," *Long Beach Press*, April 11, 1923.

the family resided at 313 S. Crescent Drive in Beverly Hills and Morehart was listed as a real estate broker.³⁷ Ten years later, the family continued to live in Beverly Hills, then at 460 S. Bedford Drive, and Morehart's occupation was that of builder and contractor.³⁸ A 1949 *Los Angeles Times* article details the sale of Morehart's two-story duplex on Bedford Drive for \$45,000.³⁹ By 1956, Morehart continued to work as a building contractor and the family lived at 10660 Holman Avenue in the Westwood area.⁴⁰ He died in Los Angeles in 1979 at the age of 88.⁴¹

Ownership/Occupant and Use Summary

City directories, historic newspaper articles, and building permits were consulted to compile a list of former owners and occupants of the Subject Properties. Based on the available ownership and occupancy information, research was conducted on each owner and occupant using available archival sources. When known, occupations were noted next to the occupant's name. Available biographical information about former owners or occupants is included below.

FIGURE 4: SUMMARY OF OWNERS/OCCUPANTS

DATE	OWNER/OCCUPANT	USE
825-827 S. Holt Avenue		
1931	C.E. Bowne (owner)	Duplex
1939	Dr. Ernest R. Trattner (author and rabbi)	Duplex
1953	Elsie Lieberman & Eva Kligman (owner)	Duplex
	Maurice and Bobby Ellis	Duplex
1970	Franklin and Shirley Morris	Duplex
1981-1986	Marsha and Shirley Rosenberg	Duplex
1988	Barbara A. Zebleywarde	Duplex
1991	Gity Shaiefar	Duplex
1993-2002	Gregory and Barbara Wardell	Duplex
1995-1999	Davood Hedvat (owner)	Duplex
829-831 S. Holt Avenue		
1931	C.E. Bowne (owner)	Duplex
1945	Leonard S. Ginne	Duplex
1947	S. P. Lev (owner)	Duplex
1991	Sue Ellen MacCann	Duplex
1992-1997	Nathan, Heather, and Saul Katz	Duplex

³⁷ United States of America, Bureau of the Census, *Fifteenth Census of the United States*, 1930, Washington, D.C.: National Archives and Records Administration, T626, 2,667 rolls.

³⁸ United States of America, Bureau of the Census, *Sixteenth Census of the United States*, 1940, Washington, D.C.: National Archives and Records Administration, T627, 4,643 rolls.

³⁹ "\$128,000 Sales Volume Reported," *Los Angeles Times*, July 3, 1949.

⁴⁰ Westwood, Brentwood and Bel Air, City Directory, 1956.

⁴¹ State of California, *California Death Index*, 1940-1997, Sacramento, CA, USA: State of California Department of Health Services, Center for Health Statistics.

DATE	OWNER/OCCUPANT	USE
1993	Larry Schwarz	Duplex
1995-1996	Jeffrey and M. L. Olander	Duplex
1996	B. E. Shapiro	Duplex
	Jean Miller Feldman	Duplex
	Lauren M. Dober	Duplex
835-837 S. Holt Avenue		
1937	Malcolm B. Morehart (owner)	Duplex
1970	M. Sehreibu (owner)	Duplex
1977	Allan M. Schreiber	Duplex
1980-1998	Shirley and Sanford Spillman (owners); Jeffrey A. Rowe (owner)	Duplex
1984	Janice M. Rhetta	Duplex
1989-1993	Bob L. Johnson (attorney)	Duplex
1992-1994	Kathy L. Bartold	Duplex
1993	David R. Schwarz	Duplex
1993-1994	Hyman Greenberg	Duplex
1994	Eula F. Wearver	Duplex
	Cameron and Janice M. Johnson	Duplex
	Ernest F. Davenport	Duplex
2003-2018	Wendy B. Wright (owner)	Duplex

Dr. Ernest R. Trattner (Occupant—827 S. Holt Avenue)

Ernest Trattner was born in 1898 in Denver, Colorado.⁴² He was an author of religious theory and the first rabbi at Temple Emanuel, established in Beverly Hills in 1938. Dr. Trattner resided at 837 S. Holt Avenue starting 1939. A year later, he married Johanna Gronskey Trattner.⁴³ By 1942, the couple had relocated to 10700 Wellworth Avenue in Westwood.⁴⁴ He served as the head rabbi of Temple Emanuel until 1947. Dr. Trattner died in Los Angeles in May 1963.⁴⁵

⁴² United States of America, Bureau of the Census, *Twelfth Census of the United States*, 1900, Washington, D.C.: National Archives and Records Administration, T623, 1854 rolls.

⁴³ "Johanna Gronskey Trattner," *Los Angeles Times*, April 11, 2001.

⁴⁴ The National Archives in St. Louis, Missouri; St. Louis, Missouri; *WWII Draft Registration Cards for California, 10/16/1940-03/31/1947*; Record Group: *Records of the Selective Service System, 147*; Box: 1824.

⁴⁵ "Trattner, Rabbi Ernest E.," *Los Angeles Times*, May 31, 1963.

9.0 HISTORIC CONTEXT: SURVEYLA CONTEXTS & THEMES

SurveyLA Context/Themes & Associated Eligibility Standards

SurveyLA is the City of Los Angeles' citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California State Office of Historic Preservation. Properties surveyed as part of SurveyLA were evaluated for eligibility for listing in the National Register of Historic Places, the California Register of Historical Resources, and for designation as a Los Angeles Historic-Cultural Monument.

Utilizing the Historic Context Statement developed by SurveyLA, the buildings on the Subject Property are evaluated under the contexts and themes as outlined below.

Context:	Residential Development and Suburbanization, 1880-1980
Theme:	Multi-Family Residential Development, 1895-1970
Sub-theme:	Apartment Houses, 1895-1970
Property Sub-type:	Duplex

Criteria: NR A/C; CR 1/3; Local 1/3

Property Sub-type Description: A duplex is a multi-family residential property that contains two units and is oriented toward the street. The earliest extant examples of duplexes date from the turn of the twentieth century. Configurations include the "double bungalow" (a single-story structure with side-by-side units), the "double house" (a pair of adjoining two-story units), and the "two-flat" (a two-story building with a unit on each floor).

Summary Statement of Significance: Apartment houses evaluated under this theme are significant in the area of Community Planning and Development. They represent an important building type that proliferated throughout the city during most of the twentieth century and reflect trends in urban planning to accommodate a wide range of full and part time residents as well as tourists and other visitors. Many examples are also significant in the area of Architecture as excellent examples of their respective architectural styles. Apartment houses range from modest duplexes, triplexes, and fourplexes to mid- and high-rise apartment buildings. Due to their versatility, apartment houses are among the most common multi-family residential building types in Los Angeles, with examples constructed in nearly every part of the city. Early examples are becoming increasingly rare. A duplex is significant for its association with residential development in Los Angeles as one of the city's earliest and most dominant multi-family residential building types.

Period of Significance: 1895 to 1970. The period of significance begins in 1895, when multi-family residential development begins in Los Angeles, in particular with the appearance of the duplex type. The end date in 1970 and may be extended over time to include additional multi-family types.

Eligibility Standards:

- Was originally constructed as a duplex
- Is an excellent example of the type

- Was constructed during the period of significance

Character-defining Features:

- Retains most of the essential physical and character defining features from the period of significance
- Composed of two units, arranged horizontally (one story) or vertically (two stories)
- Configurations include the “double bungalow” (a single-story structure with side-by-side units), the “Double house” (a pair of adjoining two-story units), and the “two-flat” (a two-story building with a unit on each floor)
- Typically occupies a single residential lot
- May also be a good to excellent example of an architectural style from its period and/or the work of a significant architect or builder
- Associated architectural styles may include, and not be limited to: Craftsman, Mission Revival, Spanish Colonial Revival, Mediterranean Revival, American Colonial Revival, Tudor Revival, French Revival, Streamline Moderne

Integrity Considerations:

- Should retain integrity of Location, Design, Materials, and Feeling
- Some original materials may be altered or removed
- Replacement of some windows may be acceptable if the openings have not been changed or resized
- If it is a rare surviving example of its type, or is a rare example in the community in which it is located, a greater degree of alteration or fewer character-defining features may be acceptable.
- Security bars have been added
- Surrounding buildings and land uses may have changed
- Where this property type is situated within a grouping of multi-family residences, it may also be significant as a contributor to a multi-family residential district. A grouping may be composed of a single property type or a variety of types.

Context: Architecture and Engineering, 1850-1980

Theme: Mediterranean & Indigenous Revival Architecture, 1893-1948

Sub-theme: Spanish Colonial Revival, 1912-1942

Criteria: NR C; CR 3; Local 3

Summary Statement of Significance: A resource evaluated under this sub-theme is significant in the area of Architecture as an excellent example of the Spanish Colonial Revival style. Significant examples exemplify the character-defining features of the style and are often the work of noted architects/builders who made use of these features to give various building types an identification with the styles of Spain, specifically the southern region of Andalusia. Because of its flexibility the Spanish Colonial Revival was widely used for a range of building types and is therefore highly abundant in the parts of the city developed during the period of significance.

Period of Significance: 1912 to 1948. The period of significance begins in 1912, when work began on the Southwest Museum, the earliest known example of the style in Los Angeles). Most

examples were constructed prior to 1942, when most private building stopped due to World War II; however, known examples date to the late 1940s.

Eligibility Standards:

- Was constructed during the period of significance
- Exemplifies the character-defining features of the Spanish Colonial Revival style
- Is an excellent example of the style and/or the work of a significant architect or builder

Character-defining Features:

- Retains most of the essential character-defining features of the style
- Typically asymmetrical horizontal assemblage of building masses
- Stucco or plastered exterior walls
- Distinctively shaped and capped chimneys
- Low sloped clay tile roofs or roof trim
- Arched openings, individually serving doors and windows or arranged in arcades
- Towers used as vertical accents to horizontal assemblages
- Patios, courtyards, and loggias or covered porches and/or balconies
- Spare detailing making use of wrought iron, wood, cast stone, terra cotta, polychromatic tile
- Grilles, or *rejas*, of cast iron or wood over windows and other wall openings
- Attic vents of clay tiles or pipe

Integrity Considerations:

- Should retain integrity of Design, Materials, Workmanship, and Feeling
- Stucco repair or replacement must duplicate the original in texture and appearance
- Roof replacement should duplicate original in materials, color, texture, dimension, and installation pattern
- New additions should be appropriately scaled and located so as not to overwhelm the original design and massing
- Evolution of plant materials is expected, but significant designed landscapes should be retained
- Original use may have changed
- Setting may have changed (surrounding buildings and land uses)
- Limited window replacement may be acceptable
- Commercial storefronts alterations may be acceptable if most of the original architectural detailing is retained and proportions are not substantially altered
- For residential properties alterations to garages may be permissible
- Security bars may have been added

10.0 EVALUATION OF ELIGIBILITY

The Subject Properties are evaluated below using eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as City of Los Angeles Historic-Cultural Monuments.⁴⁶

Criterion A/1/1 (association with events or patterns of development)

According to guidance from the National Park Service, in order to be considered eligible for designation for representing an event or pattern of development:

...A property must be associated with one or more events important in the defined historic context. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity... Mere association with historic events or trends is not enough, in and of itself, to qualify under [this criterion]; the property's specific association must be considered important as well.⁴⁷

The Subject Properties at 825-827, 829-831, and 835-837 S. Holt Avenue were not identified as eligible for listing under a multi-family residential development theme by SurveyLA.

The duplex property type is potentially significant as one of the city's earliest and most dominant multi-family residential building types. They represent an important building type that proliferated throughout the city and reflect trends in urban planning to accommodate residents as demand for housing grew during the first decades of the 20th century. By the mid-1920s, nearly half of all of the city's residential units were in multi-family buildings, including duplexes, four-flats, bungalow courts, and apartment buildings.⁴⁸ Multi-family residential properties comprise much of the residential development that occurred in the Wilshire CPA, particularly in the Wilshire Center, Koreatown, and Beverly-Fairfax neighborhoods.

Because multi-family residential development was so common in the first several decades of the 20th century, individual examples of multi-family buildings from this period are not typically eligible for historic listing under criterion A/1/1 since one or even a small handful of individual buildings do not adequately represent the *pattern* of development so prevalent during that time. Large groupings of these buildings, however, have collectively been identified as historically significant as historic districts under criterion A/1/1. Nearby areas designated by the City of Los Angeles include the Carthay Square and South Carthay Historic Preservation Overlay Zones located near the Subject Properties south of Olympic Boulevard. They contain many examples of duplex apartment buildings from the late 1920s and early 1930s. The similar Miracle Mile

⁴⁶ This report analyzes the subject properties for eligibility under Criterion A/1/1, B/2/2, and C/3/3. Criterion D/4 addresses potential archaeological resources which is outside the scope of this study.

⁴⁷ "National Register Bulletin 15."

⁴⁸ City of Los Angeles, Department of City Planning, Office of Historic Resources, "Context: Residential Development and Suburbanization, 1880-1980; Theme: Multi-Family Residential Development, 1895-1970; Sub-theme: Apartment Houses, 1895-1970," *SurveyLA: Los Angeles Historic Resources Survey Project, Historic Context Statement*, December 2018.

Historic Preservation Overlay Zone is located just east of Fairfax Avenue and south of Wilshire Boulevard

SurveyLA identified sixteen such districts eligible under the Multi-Family Residential Development Context/Theme (see Appendix B). The eligible districts represent various types of multi-family development from the first half of the 20th century. Fourteen of the eligible districts were also evaluated under the Architecture context as having significant concentrations of Period Revival-style residences.⁴⁹ Many of these districts include concentrations of duplex properties almost identical to the Subject Properties.⁵⁰

In contrast, the Subject Properties are three relatively isolated examples of 1930s duplexes and do not, by themselves, comprise a significant concentration of like-properties to adequately represent pre-World War II multi-family development in Los Angeles. The immediate vicinity consists of numerous mid- and late-20th century multi-family residences constructed after World War II and into the 1990s and is, therefore, not representative of any particular period of development. No identified or designated district can be identified that would include 825-827, 829-831, or 835-37 S. Holt Avenue as contributors.

For these reasons, the Subject Properties at 825-827, 829-831, and 835-37 S. Holt Avenue are not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as City of Los Angeles Historic-Cultural Monuments under Criterion A/1/1.

Criterion B/2/2 (association with an important person)

According to the National Park Service, properties may be eligible for an association with the lives of persons significant in our past. Persons “significant in our past” refers to individuals whose activities are demonstrably important within a local, state, or national historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. In addition, the property must be associated with a person’s productive life, reflecting the time period when he or she achieved significance.

The SurveyLA Historic Context Statement includes an “Important Persons/Individuals” theme for evaluating properties that may be significant for their association with persons who are proven to have made important individual contributions to the history of Los Angeles.

Research for this report did surface a Dr. Ernest Trattner as living at 837 Holt Avenue. Trattner was the first rabbi at Temple Emanuel in Beverly Hills but no additional evidence was uncovered to suggest his professional contributions were of such importance that he would be considered historically significant. In addition, Trattner lived at 837 Holt Avenue for no more than three years which would only be considered a small portion of his productive life. No other documentation was found to suggest that any additional former owner or occupant of 825-827,

⁴⁹ City of Los Angeles, Department of City Planning, *Historic Resources Survey Report: Wilshire Community Plan Area*, prepared by Architectural Resources Group, January 2015.

⁵⁰ One such multi-family historic district, the Olympic Boulevard Multi-Family Residential Historic District, is located one block south of the Subject Properties. The district largely consists of two-story duplexes, triplexes and fourplexes, predominantly in the Spanish Colonial Revival, Late Chateausque or Minimal Traditional styles. City of Los Angeles, Department of City Planning, *Historic Resources Survey Report: Wilshire Community Plan Area*, prepared by Architectural Resources Group, January 2015.

829-831, or 835-837 S. Holt Avenue rose to prominence in their profession or group or made significant contributions to growth or development in Los Angeles.

Therefore, the Subject Properties are not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as City of Los Angeles Historic-Cultural Monuments under Criterion B/2/2.

Criterion C/3/3 (architectural merit or work of a master architect)

According to guidance from the National Park Service, to be eligible under Criterion C/3/3, a building must clearly contain enough of the “distinctive characteristics” to be considered a true representative of the style or type. Buildings eligible for artistic merit must embody the distinctive characteristics or a type, period, or method of construction, and they must possess high artistic value. A building with some applied detailing is not eligible if the details are not fully integrated into the overall design. Additionally, per the National Park Service, a master architect “is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality.”⁵¹ Buildings eligible as the work of a master “must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.”⁵²

The Subject Properties at 825-827, 829-831, and 835-837 S. Holt Avenue consist of three two-story duplexes constructed on three contiguous and separate parcels. The duplexes at 825-827 and 829-831 S. Holt Avenue were constructed in 1931 by owner C.E. Bowne, while the duplex at 835-837 S. Holt Avenue was constructed by Malcolm B. Morehart in 1937.

The Subject Properties are representative of the duplex property type which can potentially be considered significant under criterion C/3/3. The earliest extant examples of duplexes date from the turn of the twentieth century. The three duplexes retain several character-defining features of the type, including their two-story height, “two-flat” configuration, detached garages, uniform setbacks, and association with a Period Revival style of architecture. However, in order to be eligible under the multi-family theme individually, a building must somehow be distinguished as a rare or excellent example. Although they are clear examples of the duplex property type, the Subject Properties are not distinguishable from the large number of intact duplex properties constructed during the 1930s throughout the Wilshire CPA. Large numbers of similar duplex apartments can be found just south of the Subject Properties between Olympic Boulevard and Pico Boulevard and west of the Subject Properties in the Miracle Mile area.

Similarly, all three residences retain several character-defining features of their original design in the Spanish Colonial Style, including asymmetrical configurations; cement plaster exterior wall cladding; clay tile roofs; arched openings; covered porches; and decorative grilles and vents. In order for any of the Subject Properties to be eligible individually, however, they must somehow be distinguished as an excellent example of the style and/or the work of a significant architect or builder. Although the buildings are Spanish Colonial Revival in style and retain good integrity, there is little to distinguish them from the large number of Spanish Colonial Revival multi-family buildings found throughout the Wilshire CPA and greater Los Angeles. All three buildings

⁵¹ “National Register Bulletin 15.”

⁵² “National Register Bulletin 15.”

represent modest and generally unremarkable examples of the style, exhibiting no characteristics or qualities that would distinguish them from other standard multi-family residential buildings constructed in large numbers during the same period.

Additionally, no known architect was associated with the design of the three buildings; original building permits name only builders. Little is known about C.E. Bowne, who constructed the two duplexes at 825-827 and 829-831 S. Holt Avenue. Little is also known about Malcolm B. Morehart's life or career as a builder. Neither Browne or Morehart is considered a master builder. There is no evidence to indicate that either Browne or Morehart was recognized in their lifetimes or later as exemplary craftsman of consummate skill.

For these reasons, the Subject Properties are not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as City of Los Angeles Historic-Cultural Monuments under Criterion C/3/3.

11.0 RECOMMENDATIONS

Based on an observation of existing conditions, research related to the history of the property, review of the relevant historic contexts, and an analysis under the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City of Los Angeles Historic-Cultural Monument, the Subject Properties at 825-827, 829-831, and 835-837 S. Holt Avenue do not appear eligible for listing at the federal, state, or local levels. They are not significant for an association with important events/patterns of development; they are not associated with an important person; and they do not meet the eligibility requirements for designation as excellent examples of an architectural style or type, or as the work of a master architect. Therefore, the Subject Properties do not warrant further consideration or additional analysis as historical resources as defined by the California Environmental Quality Act (CEQA).

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APPENDIX A – BUILDING PERMIT CHRONOLOGY

DATE	PERMIT NO.	DESCRIPTION OF WORK	OWNER/ OCCUPANT	ARCHITECT/ CONTRACTOR	USE
825-827 Holt Avenue					
5/20/1931	LA10497	New two story, 36' x 54' wood-frame duplex, with brick chimney, stucco exterior finish, and tile and composition roofing	C.E. Bowne	Owner	Duplex
5/20/1931	LA10498	New one story, 18' x 36' wood-frame private garage, with stucco exterior finish and tile and composition roofing	C.E. Bowne	Owner	Private Garage
6/10/1953	LA59841	Remove infested timbers of front stairway, construct seal-off, replace removed timbers with new, replace removed stucco. Remove infested timbers under a roh[sic], raise this are with blocks or poured concrete, replace removed timbers with new, clean out sub area scrapwood, spray sub-area soil surface.	Elsie Lieberman & Eva Kligman	Community Termite Control Co.	Dwelling & double garage
4/21/1994	LA17407	EQ damage repair epoxy the crack at nonbearing retaining wall in basement	Davood Hedvat	Yousef Moradzadeh	Duplex
829-831 Holt Avenue					
5/14/1931	LA09998	New two story, 36' x 54' wood-frame duplex, with brick chimney, stucco exterior finish, and tile and composition roofing	C.E. Bowne	Owner	Duplex
5/14/1931	LA09999	New one story, 18' x 36' wood-frame private garage, with stucco exterior finish and tile and composition roofing	C.E. Bowne	Owner	Priv. Garage
2/14/1947	LA03711	Tear out floors of two downstairs stall shower, replace fungus damaged and flooring, add/[sic] framing, install new room partition, plan and [sic] drains, and re-tile.	S.P. Lev	Wilkel Pest Control Co.	Duplex (Dwelling)
835-837 Holt Avenue					
1/7/1937	LA00626	New two story, 34' x 60' wood-frame duplex, with brick chimney, stucco exterior finish, and tile roofing	M.B. Morehart	None	Duplex
1/7/1937	LA00627	New one story, 18' x 36' wood-frame private garage, with stucco exterior finish and composition roofing	M.B. Morehart	None	Pr. Gar.
3/24/1937	LA09215	Interior tile	Moorhart[sic]	Selectile Contractors	Residence
9/17/1970	LA15893	Wet sandblast	M. Sehreibu	Tom McCain	Dwelling

DATE	PERMIT NO.	DESCRIPTION OF WORK	OWNER/ OCCUPANT	ARCHITECT/ CONTRACTOR	USE
3/19/1980	LA99882	Remodeling & extending front porch	Mr. and Mrs. Spillman	B. Graves / N. Breen	Duplex
7/30/1980	LA53565	Two-story, type, 11' x 13' addition to existing two story, two family dwelling. R-1 occupancy.	Mr. Spillman		Two family dwelling
5/26/1998	98016-30000-09817	Reroof flat section of units only; remove existing roofing install class A built up roof, 15 sqs	Rowe, Jeffrey A Co Tr Spillman Rowe	Mar Vista Roofing Inc	Duplex
3/12/2003	03042-90000-08022	Install earthquake valve	Wright, Wendy B	Padilla Plumbing	1 or 2 family dwelling
3/10/2011	10014-20000-04344	Add 212 SF walking deck on the 2 nd floor on the (E) duplex per eng calcs	Wright, Wendy B	Golden Construction Services Inc	Duplex
3/12/2018	18042-90000-07047	Installed air gap and standpipe for washer and gas line for clothes dryer	Write, Wendy B	Shaw Jim Plumbing Inc	1 or 2 family dwelling
3/13/2018	18041-90000-09240	Replace 3 existing smoke alarms with c/o combo type	Wright, Wendy B	Self Powered Electric	1 or 2 family dwelling

APPENDIX B – SURVEY FINDINGS: MULTI-FAMILY RESIDENTIAL HISTORIC DISTRICTS IN THE WILSHIRE CPA

NO.	DISTRICT NAME	DESCRIPTION	PERIOD OF DEVELOPMENT & ASSOCIATED STYLES
1	4th Street-Colgate Avenue Residential Historic District	The 4th Street-Colgate Avenue Residential Historic District is located in the Beverly-Fairfax neighborhood of central Los Angeles, on West 4th Street between South Orlando Avenue and South Fairfax Avenue, and on Colgate Avenue between South Orlando Avenue and South Sweetzer Avenue. 84 out of 106 total contributors are duplexes.	The period of development for the district is 1922 to 1953, and residences are predominantly Spanish Colonial Revival or Tudor Revival in style. Common features, depending on the style, include clay tile roofing, arched window and door openings, stucco cladding and exterior staircases.
2	6th Street-Orange Street Multi-Family Residential Historic District	The 6th Street-Orange Street Multi-Family Residential Historic District is a historic district in the Beverly-Fairfax neighborhood of Los Angeles. The district consists of 221 parcels containing two-story, multi-family residences along West 6th Street and West Orange Street, between South San Vicente Boulevard and South Fairfax Avenue. Of the 221 parcels, 196 are contributors and 25 are non-contributors to the district.	The dominant period of development for the district is 1915 to 1954, and most apartments are constructed in the Spanish Colonial Revival (several with Moorish Revival characteristics) and Mediterranean Revival styles, with some in the French Revival and Minimal Traditional styles. Common features include clay tile roofing, arched entryways and exterior staircases.
3	Alandele Avenue Multi-Family Residential Historic District	The Alandele Avenue Multi-Family Residential Historic District is a multi-family historic district located in the Mid-Wilshire area of central Los Angeles. The district consists of one- and two-story duplexes, triplexes, fourplexes and apartment houses along both sides of Alandele Avenue, bounded by 8th Street to the north and Olympic Boulevard to the south. All 28 properties within the district are contributors to its significance.	The dominant period of development for the district is 1938 to 1952. The district consists of various types of multi-family residences predominantly constructed in the Minimal Traditional style; a few properties are in the Mid-Century Modern, Spanish Colonial Revival and French Revival styles. Common architectural features include shallow roof pitches, stucco cladding and exterior staircases.
4	Beachwood Drive-Plymouth Boulevard Multi-Family Residential Historic District	The Beachwood Drive-Plymouth Boulevard Multi-Family Residential Historic District is a block-long historic district in the Larchmont neighborhood of central Los Angeles. The multi-family residential district includes parcels on the east side of North Beachwood Drive and both sides of North Plymouth Boulevard, from just south of Melrose Avenue to Clinton Street. The topography of the historic district slopes slightly upward towards Melrose Avenue. Of the 21 total properties, 19 are contributors and two are non-contributors to the district.	The dominant period of development for the district is 1923 to 1937, and most residences are in the Spanish Colonial Revival style; a few are in the American Colonial Revival, Tudor Revival and Mediterranean Revival styles. Fourplexes, duplexes, apartment houses and bungalow courts comprise the multi-family property types within the district. Common architectural features include clay tile roofing, stucco cladding and arched window and door openings.
5	Beverly Square Multi-Family Residential Historic District	The Beverly Square Multi-Family Residential Historic District is located in the Beverly-Fairfax neighborhood of central Los Angeles. Parcels along both sides of Flores Street, south of the alley behind Beverly Boulevard and just north of 3rd Street, and along both sides of Sweetzer Avenue, south of the alley behind Beverly Boulevard to 1st Street, are included in the district. Of the 38 properties within the district, 36 are contributors and two are noncontributors.	The dominant period of development for the district is 1929 to 1948. It comprises two-story duplexes, triplexes, fourplexes and courtyard apartments predominantly in the Minimal Traditional style with Streamline Moderne and American Colonial Revival style elements. Common architectural features, depending on the style, include smooth stucco cladding, often in combination with wood clapboard or another material, rounded corners and corner windows. Other styles include Tudor Revival, American Colonial Revival, French Revival and Spanish Colonial Revival.
6	Citrus Avenue Multi-Family Residential Historic District	The Citrus Avenue Multi-Family Residential Historic District is a historic district containing	The dominant period of development for the historic district is 1923-1952. Most

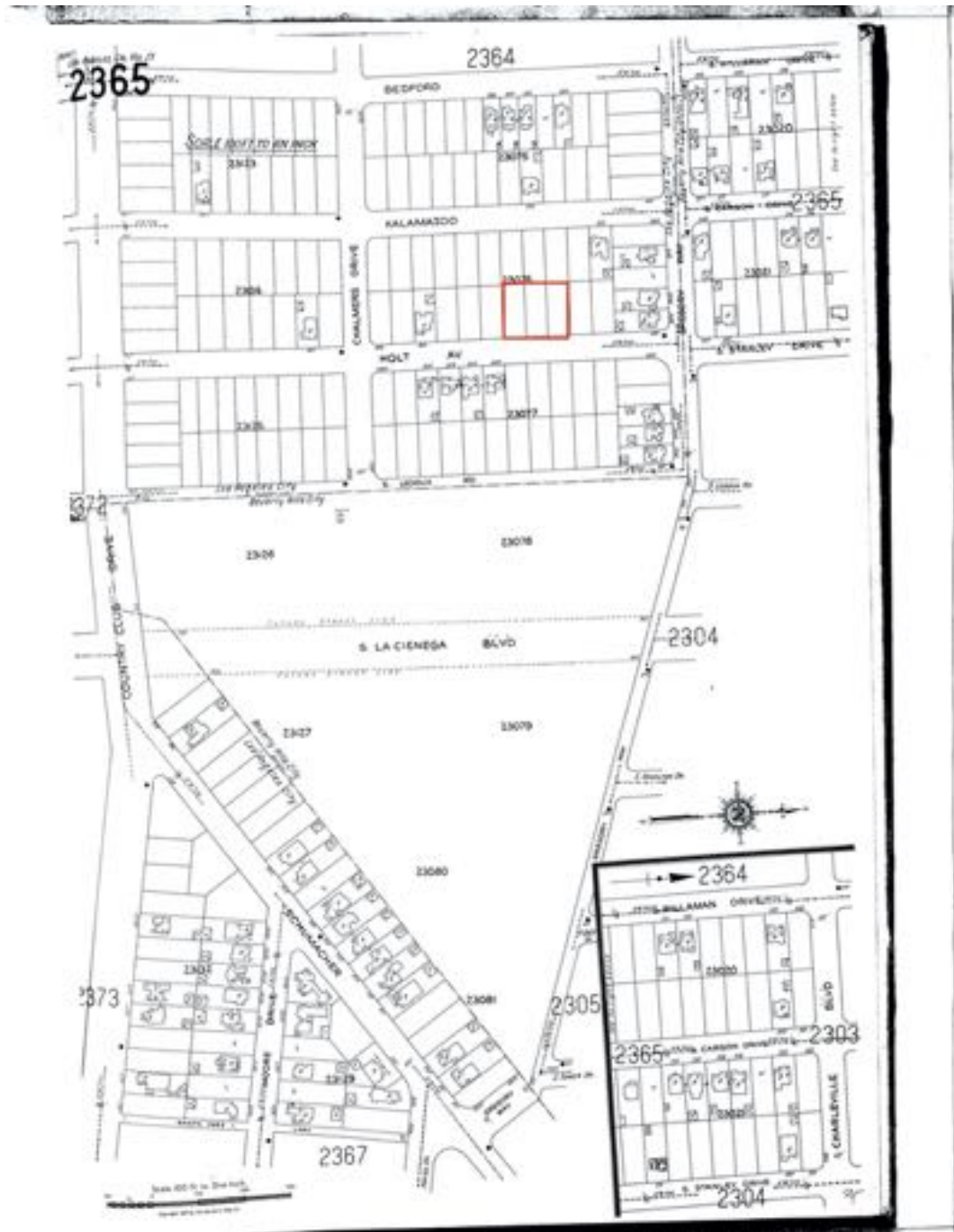
NO.	DISTRICT NAME	DESCRIPTION	PERIOD OF DEVELOPMENT & ASSOCIATED STYLES
		mostly multi-family residences in the Mid-Wilshire area of central Los Angeles. The district includes parcels along both sides of South Citrus Avenue, bounded by Edgewood Place to the north and Dockweiler Street to the south. The district consists of predominantly one and two-story multi-family residences, with a few single-family residences that predate the multi-family properties by a couple of years. It contains 46 properties, of which 38 are contributors and eight are non-contributors to the district.	residences are constructed in various Period Revival styles, including Spanish Colonial Revival, French Revival, Tudor Revival, Moorish Revival and Late Chateausque; there are a few residences in the Minimal Traditional style as well. Common features, depending on the style, include stucco cladding and arched window and door openings.
7	Crescent Heights Boulevard-Stearns Drive Residential Historic District	The Crescent Heights Boulevard-Stearns Drive Residential Historic District is a historic district of multi-family and single-family residences in the Pico-Robertson area, bounded by Saturn Street on the north, Stearns Drive on the east, Airdrome Street and parcels north of Pickford Place on the south, and Crescent Heights Boulevard on the west. It contains 114 properties, of which 94 are contributors.	The district's contributors, constructed between 1915 and 1938, are mostly Spanish Colonial Revival style with some Tudor Revival and a few Minimal Traditional. Infill outside of the period of significance consists of postwar Minimal Traditional buildings: two duplexes (1948 and 1950) and one triplex (1947). Several of the area's Spanish Colonial Revival designs are repeated multiple times, suggesting a common builder and/or architect, and feature complexly gabled rooflines with dormers and turrets.
8	Curson Avenue-Hauser Boulevard Residential Historic District	The Curson Avenue-Hauser Boulevard Residential Historic District is a concentration of single and multi-family residences in the Mid-Wilshire area of central Los Angeles. The district includes parcels along both sides of South Curson Avenue, South Sierra Bonita Avenue, South Masselin Avenue and Hauser Boulevard, from 8th Street to just north of Olympic Boulevard. The topography of the district is predominantly hilly along Curson Avenue and flattens out moving eastward. Of the district's 153 properties, 119 are contributors and 34 are non-contributors.	The dominant period of development of the residential historic district is from 1924 to 1959. Sierra Bonita Avenue, Masselin Avenue and Hauser Boulevard primarily consist of modest single-family houses, with multi-family residences at the north and south ends. Curson Avenue is lined predominantly with two-story multi-family duplexes, fourplexes and apartment houses. Most residences are constructed in the Spanish Colonial Revival style, with some in the Tudor Revival and Minimal Traditional styles. Common architectural features include stucco cladding and arched window openings and entryways.
9	Edgemont Street-New Hampshire Avenue Multi-Family Residential Historic District	The Edgemont Street-New Hampshire Avenue Multi-Family Residential Historic District is a historic district of multi-family residences in the Wilshire Center area of central Los Angeles. The district includes parcels along both sides of Edgemont Street, from just south of Beverly Boulevard to 2nd Street; on both sides of Kenmore Avenue, from just south of Beverly Boulevard to just north of 3rd Street; on the west side of Catalina Street, from just south of Council to just north of 3rd Street and on the east side of Catalina Street, from 1st Street to just north of 3rd Street; and on both sides of Berendo Street and New Hampshire Avenue, from 1st Street to just north of 3rd Street. Of the 245 properties in the district, 214 are contributors and 31 are non-contributors.	The dominant period of development for the historic district is 1921 to 1950, and various Period Revival styles, including Mediterranean Revival (most common), Spanish Colonial Revival, Tudor Revival, American Colonial Revival and French Revival are typical. Although fourplexes and apartment houses are most prevalent, duplexes, triplexes and courtyard apartments are also present.

NO.	DISTRICT NAME	DESCRIPTION	PERIOD OF DEVELOPMENT & ASSOCIATED STYLES
10	North Detroit Street Multi-Family Residential Historic District	The North Detroit Street Multi-Family Residential Historic District is a block-long multi-family historic district in the BeverlyFairfax neighborhood of central Los Angeles. It consists of parcels along both sides of North Detroit Street, from Oakwood Avenue to just north of Beverly Boulevard. All of the multi-family residences are duplexes, two of which comprise a courtyard apartment. Of the 22 properties within the district, 19 are contributors and 3 are non-contributors to the district.	The dominant period of development for the district is 1928 to 1953. The district consists of multi-family residences predominantly constructed in the Spanish Colonial Revival, French Revival, Late Chateausque and Minimal Traditional styles.
11	Oakhurst Drive Multi-Family Residential Historic District	The Oakhurst Drive Multi-Family Residential Historic District is a small multi-family historic district along the east side of North Oakhurst Drive, at the boundary between Beverly Hills and Los Angeles (the primary façades of the buildings and the west side of the street are in Beverly Hills). The residential district includes parcels along the east side of North Oakhurst Drive, just south of Alden Drive to just north of West 3rd Street. All nine properties are contributors to the district.	The dominant period of development for the district is 1930 to 1939. The district consists of two-story duplexes, fourplexes and apartment houses predominantly in the Spanish Colonial Revival or Minimal Traditional style with Monterey Revival and American Colonial Revival style features.
12	Olympic Boulevard Multi-Family Residential Historic District	The Olympic Boulevard Multi-Family Residential Historic District is a multi-family historic district located in the Pico-Robertson neighborhood of central Los Angeles. Included in the district are two-story residences along the north side of Olympic Boulevard from just west of Shenandoah Street to Le Doux Road, and parcels along the south side of Olympic Boulevard from just east of Wooster Street to just east of Holt Avenue. Of the 42 properties within the district, 32 are contributors and 10 are non-contributors to the district.	The dominant period of development for the district is 1931 to 1954 with some 1980s and 1990s infill. The district mostly consists of two-story duplexes, triplexes and fourplexes, predominantly in the Spanish Colonial Revival, Late Chateausque or Minimal Traditional styles. Common features, depending on the style, include smooth stucco cladding, arched window and door openings, exterior staircases and minimal ornamentation.
13	Orange Grove Avenue-Gardner Street Multi-Family Residential Historic District	The Orange Grove Avenue-Gardner Street Multi-Family Residential Historic District is a predominantly multi-family historic district (with a few single-family residences along the edges) located in the Beverly-Fairfax neighborhood of central Los Angeles. Bounded by Rosewood Avenue to the north and Beverly Boulevard to the south, the district's properties line both sides of North Orange Grove Avenue, North Ogden Drive, North Genesee Avenue, North Spaulding Avenue, North Stanley Avenue, North Curson Avenue, Sierra Bonita Avenue and North Gardner Street. There are a total of 380 parcels in the district, 332 of which are contributing and 48 of which are non-contributing.	The dominant period of development for the district is 1925 to 1949, and most houses are constructed in various Period Revival styles, including Spanish Colonial Revival, Tudor Revival, Mediterranean Revival and French Revival; Monterey Revival, Minimal Traditional and Late Chateausque styles are also represented in the district. Typical architectural features, depending on the style, include stucco cladding, arched window and door openings and exterior staircases.

NO.	DISTRICT NAME	DESCRIPTION	PERIOD OF DEVELOPMENT & ASSOCIATED STYLES
14	Orange Grove Avenue-Ogden Drive-Genesee Avenue Multi-Family Residential Historic District	The Orange Grove Avenue-Ogden Drive-Genesee Avenue Multi-Family Residential Historic District is a multi-family residential historic district in the Mid-Wilshire area of central Los Angeles. The district includes two-story fourplexes, triplexes, duplexes and courtyard apartments along South Orange Grove Avenue, just south of San Vicente Boulevard to Packard Street, and along South Ogden Drive and South Genesee Avenue between San Vicente Boulevard and Whitworth Drive. A regular, rectilinear grid comprises the street pattern within the district. There are a total of 117 properties, 112 of which are contributing and 5 of which are non-contributing to the district.	The dominant period of development for the district is 1927 to 1950, and residences are primarily Spanish Colonial Revival or Minimal Traditional in style. Common elements, depending on the style, include clay tile roofs, exterior staircases, stucco cladding and arched window and door openings. Most of the Minimal Traditional style residences feature French Revival or American Colonial Revival design elements.
15	Rimpau Boulevard Residential Historic District	The Rimpau Boulevard Residential Historic District is a district of predominantly multi-family residences in the Mid-Wilshire area of central Los Angeles. It includes parcels along both sides of Rimpau Boulevard, from Edgewood Place to just north of Pico Boulevard. It contains 76 properties, of which 63 are contributors and 13 are non-contributors to the district.	The dominant period of development for the residential historic district is from 1922 to 1953. Two-story duplexes are the most common property type, with lesser numbers of fourplexes and single-family residences. Most properties are constructed in the Spanish Colonial Revival style, with a few Tudor Revival, American Colonial Revival, Minimal Traditional, and Mid-Century Modern-style residences.
16	South Detroit Street Multi-Family Residential Historic District	The South Detroit Street Multi-Family Residential Historic District is located in the Mid-Wilshire area of Los Angeles, near Miracle Mile. Small in size and linear in form, the district spans a three-block-long stretch of South Detroit Street that is bounded by Wilshire Boulevard on the north and Olympic Boulevard on the south. The district contains a total of 50 residential properties, of which 47 are contributors.	Duplexes account for a majority of properties within the district, but other types of multi-family housing, including fourplexes and apartment houses, can be found in the area north of 8th Street. The district also includes one single-family residence located amongst the multi-family dwellings. All of the residences are two stories in height, occupy uniformly-sized rectangular parcels, and share common setbacks and massing. Constructed between 1923 and 1940, district contributors embody one or more Period Revival styles that were fashionable at the time with the Spanish Colonial Revival, Mediterranean Revival, and Tudor Revival styles being the most common. Most of the residences feature modest front lawns, and many are accompanied by a porte cochère.
17	Sycamore Avenue-Citrus Avenue North Multi-Family Residential Historic District	The Sycamore Avenue-Citrus Avenue North Multi-Family Residential Historic District is located in the Hancock Park area of central Los Angeles, just east of La Brea Avenue. The predominantly multi-family residential district includes parcels on both sides of Sycamore Avenue, Orange Drive and Mansfield Avenue, bounded by Rosewood Avenue to the north and 3rd Street to the south; and both sides of South Citrus Avenue between Rosewood Avenue and Beverly Boulevard, and between 2nd and 3rd Streets. Of the 458 total properties, 408 are contributors and 50 are non-contributors to the district.	The dominant period of development for the district is 1924 to 1950. The district consists primarily of multi-family residences; Sycamore Avenue is lined with fourplexes and a few larger apartment houses, and Orange Drive and Mansfield Avenue (between Oakwood and 3rd Street) have mostly duplexes. Mansfield Avenue, between Oakwood Avenue and Rosewood Avenue, and Citrus Avenue contain mostly one and two-story single-family houses. Both single and multi-family residences are primarily in the Spanish Colonial Revival and Tudor Revival styles, with a few in the

NO.	DISTRICT NAME	DESCRIPTION	PERIOD OF DEVELOPMENT & ASSOCIATED STYLES
			Mediterranean Revival style. Typical architectural features include stucco cladding, clay tile or composition shingle roofing, and arched window and door openings.

APPENDIX C- SANBORN FIRE INSURANCE MAPS



1927 Sanborn Fire Insurance map. Subject Properties outlined in red.



1950 Sanborn Fire Insurance map. Subject Properties outlined in red.

APPENDIX E – RESUMES OF AUTHORS/CONTRIBUTORS

HISTORIC RESOURCES GROUP

Years of Experience: 14

Education

Master of Arts in Urban Planning,
University of California, Los Angeles,
2006

Bachelor of Fine Arts, Printmaking,
San Jose State University, San Jose,
1985

Speaking Engagements

California Preservation Foundation

- Historic Resources and the California Environmental Quality Act
- Historic Resources Surveys
- Preservation Planning

American Planning Association,
California Chapter

- Preservation Planning

Professional Affiliations

American Institute of Certified
Planners, Member

American Planning Association,
Urban Design & Preservation
Division, Member

American Planning Association,
Los Angeles Chapter, Member

California Preservation Foundation,
Guest Speaker, Workshop Leader

National Trust for Historic
Preservation, Member

PAUL TRAVIS MANAGING PRINCIPAL

Experience Profile

Paul Travis specializes in master planning, CEQA, NEPA and Section 106 environmental review, and historic resources assessment. At HRC, Paul manages planning-related projects with a focus on large, multi-property sites including college campuses, historic downtowns, neighborhoods and districts, industrial sites, motion picture studios, and military bases. Paul has drafted preservation plans for the University of Southern California, NBC Universal Studios, Hollywood, and Los Angeles International Airport. He has participated in the development of community plans or specific plans for Paso Robles, Fresno, and Whittier; and has been involved in the master planning process for Loyola Marymount University, Occidental College, Mount St. Mary's College, Fox Studios, the Alameda Naval Station, and the Downey NASA site. Recent survey experience includes historic resource surveys for the cities of Los Angeles, Ventura, Glendale, Paso Robles, San Diego, and Fresno.

Prior to working at HRC, Paul worked as a research assistant at the Lewis Center for Regional Policy Studies performing academic research for study of transit-oriented development along the Pasadena Gold Line light rail system. Responsibilities include gathering and analysis of ridership data and adjacent development activity, and field observation of conditions surrounding transit stops.

Paul Travis meets the *Secretary of the Interior's Professional Qualification Standards* in Historic Preservation in Historic Preservation Planning and History.

Selected Project Experience

City of Fresno Fulton Corridor Specific Plan, Fresno

Fox Studios Master Plan, Century City

LAX Historic Assessments, Environmental Review, Preservation Plan

NBC Universal Evolution Plan, Universal City

Sunset Bronson Studios, Hollywood

Thacher School, Ojai

HISTORIC RESOURCES GROUP

Years of Experience: 2

Education

Master of Science, Historic Preservation, University of Texas, Austin, TX, 2019

Bachelor of Science, Policy, Planning & Development, University of Southern California, Los Angeles, CA, 2013

Honors & Distinctions

American Association of Geographers, Presenter, 2019

Preserving the Recent Past 3, Presenter, 2019

My Liveable City, Contributing Author, 2017

California Preservation Foundation, Presenter, 2017

Segal AmeriCorps Education Award, Recipient, 2014

Professional Affiliations

California Preservation Foundation

Los Angeles Conservancy

American Planning Association

American Association of Geographers

MORGAN QUIRK

ASSOCIATE PRESERVATION PLANNER

Experience Profile

Morgan Quirk first joined Historic Resources Group as an intern in 2017 and returned after completing her graduate studies. She holds a Master of Science in Historic Preservation from the University of Texas School of Architecture and a Bachelor of Science in Policy, Planning & Development with an emphasis on Urban Planning from the University of Southern California Sol Price School of Public Policy. At Historic Resources Group, Morgan supports staff with GIS mapping skills and performing research for historic resources surveys, historic context statements, historic resource assessments, historic structures reports, and nomination forms. In addition to her experience in architectural history research methodologies, Morgan has advanced knowledge of geospatial statistical analysis in ArcGIS Desktop, relational database management, data manipulation, and 3D modeling.

Prior to joining HRG, Morgan centered her master's thesis research on the nexus of geospatial statistical analysis and the designation of Los Angeles Historic Cultural Monuments. With ArcGIS, she conducted an independent survey of designated resources to build a predictive model using a geographically weighted regression. The mapped model aimed to increase inclusivity in local preservation practice by identifying Los Angeles neighborhoods that lack monument representation for historically marginalized communities.

Morgan Quirk meets the *Secretary of the Interior's Professional Qualifications Standards* in Historic Preservation Planning and Architectural History.

Selected Project Experience

SurveyLA, Los Angeles

John Tracy Clinic Assessment Report

French Market Place Assessment Report