



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

Mitigated Negative Declaration

AAA Parking Structure Project

Case Number: ENV-2019-6290-MND
CPC-2019-6289-GPA-ZC-HD

Project Location: 640-700 West 27th Street, Los Angeles, CA 90007
Community Plan Area: South Los Angeles
Council District: 9 – Curren D. Price, Jr.

Project Description: The Project proposes the demolition of an existing surface parking lot and the construction use and maintenance of a 4.5-story parking structure with up to 750 parking spaces. The Project would consist of an approximate 202,200 gross square foot parking structure. The Project Site is comprised of eight parcels in the City of Los Angeles (City). Vehicular access to the parking structure would be provided via one full-access driveway from 27th Street on the northwest corner of the Project Site. The parking structure would provide new parking spaces to serve the existing commercial office building located north of the Project Site at 2601 S. Figueroa Street. The Project would also include 70 bicycle parking spaces.

The Applicant is requesting the following discretionary approvals to permit the construction of a 202,200 square-foot parking structure, approximately 48 feet and approximately 4.5 stories in height, to include: a) Up to 750 parking spaces (including 15 ADA accessible spaces) and b) Up to 70 long-term and short-term bicycle parking spaces: (1) Pursuant to LAMC Section §11.5.6, a City-initiated General Plan Amendment (GPA) to change the land use designation of the Site from the existing Low Medium II Residential to the proposed Community Commercial designation; and (2) Pursuant to LAMC Section §12.32.F, Zone Change (ZC) and Height District (HD) change to the zoning height district from the existing RD1.5-1-O to C2-2-O. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: site clearing, foundation, building and tenant improvements, and the removal and replacement of street trees.

PREPARED FOR:
The City of Los Angeles
Department of City
Planning

PREPARED BY:
Parker Environmental
Consultants, LLC

APPLICANT:
ACSC Management
Services, Inc

February 2021

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION (IS/MND)

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APPENDIX B: TREE REPORT

The Urban Lumberjack, Tree Report, 640-700 W. 27th Street, Los Angeles, February 7, 2020.

APPENDIX C: GEOTECHNICAL INVESTIGATION

Los Angeles Department of Building and Safety, Geology and Soils Report Approval Letter, Location: 640-700 W. 27th Street, LOG # 113091-01, July 23, 2020.

Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, March 10, 2020.

APPENDIX D: GREENHOUSE GAS EMISSIONS CALCULATIONS WORKSHEETS

APPENDIX E: ENVIRONMENTAL SITE ASSESSMENT

Priority One Environmental, Phase I Environmental Site Assessment, January 14, 2020.

APPENDIX F: NOISE MONITORING DATA AND CALCULATIONS WORKSHEETS

APPENDIX G: TRANSPORTATION

Los Angeles Department of Transportation, Inter-Departmental Correspondence to the Planning Department, Parking Lot Access and Circulation Transportation Study for the Project at 640 West 27th Street, August 5, 2020.

Gibson Transportation Consulting, Inc., Site Access and Circulation Evaluation for the Automobile Club of Southern California, Parking Structure Project, Los Angeles, California, June 2, 2020.

APPENDIX H: ENERGY CONSUMPTION WORKSHEETS

APPENDIX I: CULTURAL RESOURCES RECORDS SEARCH

South Central Coastal Information Center, Record Search Results for AAA Parking Structure Project [ENV-2019-6290-EAF], March 13, 2020.

APPENDIX J: BIOLOGICAL RESOURCES RECORDS SEARCH

U.S. Fish & Wildlife Service, Information for Planning and Consultation (IPaC) Resource List, December 6, 2019.

APPENDIX K: WILL-SERVE LETTERS

Los Angeles Police Department, Response Letter for The AAA Parking Structure Project [ENV-2019-6290-EAF], February 2, 2020.

APPENDIX L: LAND USE CONSISTENCY TABLES

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¹ Consistent with Gov. Code Sections 6254, subd.(r) and 6254.10. (Pub. Resources Code § 21082.3, subd. (c)(1)), this Appendix contains confidential materials and is not to be made publicly available.

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Section 1. Introduction

Project Information

Project Title: AAA Parking Structure Project

Project Location: 640-700 W. 27th Street
Los Angeles, CA 90007

Project Applicant: ACSC Management Services, Inc.
2601 S. Figueroa Street
Los Angeles, CA 90007

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

An application for the proposed AAA Parking Structure Project (“Project”) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and the preparation of an Initial Study is required.

This Initial Study/Mitigated Negative Declaration (IS/MND) provides an analysis of the potential environmental effects resulting from construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code (P.R.C.) §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this IS/MND, the City has concluded that the Project will not result in significant impacts on the environment with the incorporation of mitigation measures identified herein. This IS/MND is intended as an informational document, and provides the substantial evidence to support the adoption of an MND by the decision maker prior to project approval by the City.

1.1 Purpose of an Initial Study

The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study (IS) is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

1.2. Organization of the Initial Study

This Initial Study is organized into six sections as follows:

SECTION 1. INTRODUCTION: This Section provides introductory information such as the Project title, the Project Applicant, and the Lead Agency for the Project.

SECTION 2. EXECUTIVE SUMMARY: This Section provides Project information, identifies key areas of environmental concern, and includes a determination whether the Project may have a significant effect on the environment.

SECTION 3. PROJECT DESCRIPTION: This Section provides a description of the environmental setting of the Project, including Project characteristics, related project information and a list of requested discretionary actions.

SECTION 4. EVALUATION OF ENVIRONMENTAL IMPACTS: This Section contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

SECTION 5. PREPARERS AND PERSONS CONSULTED: This Section provides a list of consultant team members and governmental agencies that participated in the preparation of the IS.

SECTION 6. REFERENCES, ACRONYMS AND ABBREVIATIONS: This Section includes various documents and information used and referenced during the preparation of the IS, along with a list of commonly used acronyms.

1.3. CEQA Process

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared an Initial Study to identify the preliminary environmental impacts of the project. The Initial Study for the Project determined that the Project would not have significant environmental impacts with the incorporation of mitigation measures identified herein.

INITIAL STUDY

Section 2. Executive Summary

PROJECT TITLE	AAA Parking Structure Project
ENVIRONMENTAL CASE NUMBER	ENV-2019-6290-MND
RELATED CASES	CPC-2019-6289-GPA-ZC-HD
PROJECT LOCATION	640 – 700 W. 27 th Street Los Angeles, CA 90007
COMMUNITY PLAN AREA	South Los Angeles
COUNCIL DISTRICT:	9 – Curren D. Price, Jr.
LEAD AGENCY	City of Los Angeles Department of City Planning
STAFF CONTACT NAME AND ADDRESS	Sergio Ibarra 200 N. Spring Street, Room 721 Los Angeles CA 90012
PHONE NUMBER	(213) 473-9985
APPLICANT NAME AND ADDRESS	ACSC Management Services, Inc. 2601 S. Figueroa Street Los Angeles, CA 90007
PHONE NUMBER	(213) 741-3686
GENERAL PLAN DESIGNATION	Low Medium II Residential
ZONING	RD1.5-1-O

PROJECT DESCRIPTION:

The Project proposes the demolition of an existing surface parking lot and the construction use and maintenance of a 4.5-story parking structure with up to 750 parking spaces. The Project would consist of an approximate 202,200 gross square foot parking structure. The Project Site is comprised of eight parcels in the City of Los Angeles. Vehicular access to the Project Site would be provided via one full-access driveway from 27th Street on the northwest corner of the Project Site. The parking structure would provide new parking spaces to serve the existing commercial office building located north of the Project Site at 2601 S. Figueroa Street. The Project would also include 70 bicycle parking spaces.

The Applicant is requesting the following discretionary approvals to permit the construction of a 202,200 square-foot parking structure, approximately 48 feet and approximately 4.5 stories in height, to include: a) Up to 750 parking spaces (including 15 ADA accessible spaces) and b) Up to 70 long-term and short-term bicycle parking spaces: (1) Pursuant to LAMC Section §11.5.6, a City-initiated General Plan Amendment (GPA) to change the land use designation of the Site from the existing Low Medium II Residential to the proposed Community Commercial designation; and (2) Pursuant to LAMC Section §12.32.F, Zone Change (ZC) and Height District (HD) change to the zoning height district from the existing RD1.5-1-O to C2-2-O. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety (DBS) and other municipal agencies for project construction actions, including but not limited to the following: site clearing, foundation, building and tenant improvements, and the removal and replacement of street trees. (For additional detail, see "Section 3. Project Description").

ENVIRONMENTAL SETTING:

The Project Site includes eight parcels with the following Assessor Parcel Numbers (APN No. 5123-015-006, 5123-015-007, 5123-015-008, 5123-015-009, 5123-016-001, and 5123-016-002) that encompasses 69,731 square feet of lot area (1.6 acres). The Project Site is currently occupied by a paved surface parking lot. The surrounding properties are developed with a mix of low-density to high-density residential neighborhoods and commercial office land uses. (For additional detail, see "Section 3. Project Description").

Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.): N/A

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes. See responses provided in Section XVIII. Tribal Cultural Resources, in the IS/MND. The AB 52 consultation materials are included in Appendix M and are marked as confidential.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See P.R.C. Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per P.R.C. Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that P.R.C. Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Hazards & Hazardous Materials	<input type="checkbox"/> Recreation
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Hydrology / Water Quality	<input checked="" type="checkbox"/> Transportation
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Utilities / Service Systems
<input type="checkbox"/> Energy	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Wildfire
<input checked="" type="checkbox"/> Geology / Soils	<input type="checkbox"/> Population / Housing	<input checked="" type="checkbox"/> Mandatory Findings of Significance

DETERMINATION (to be completed by Lead Agency)

On the basis of this initial evaluation:

- I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

- I find the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

- I find the Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

Sergio Ibarra
PRINTED NAME



SIGNATURE

City Planner
TITLE

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of a mitigation measure has reduced an effect from “Potentially Significant Impact” to “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Section 3. Project Description

3.1 Project Summary

ACSC Management Services, Inc. (the “Applicant”) proposes the demolition of an existing surface parking lot for the construction use and maintenance of a 4.5-story parking structure with up to 750 parking spaces. The Project would consist of an approximate 202,200 gross square foot parking structure. The Project Site is comprised of eight parcels in the City that have been utilized as surface parking for AAA since 1969. Vehicular access to the Project Site would be provided via one full-access driveway from 27th Street on the northwest corner of the Project Site. The parking structure would provide new parking spaces for the existing AAA owned and operated properties, including the AAA Headquarters building, located directly north of the Project Site at 2601 S. Figueroa Street. The Project would also include 70 bicycle parking spaces.

The Project would include a 25-foot front yard setback fronting W. 27th Street, a 12-foot side yard setback along the western property line, a 26-foot and 4-inch side yard setback along the eastern property line, and a 9-foot rear yard setback along the southern property line fronting the alley. In addition, the Project would include approximately 19,181 square feet of open space, including 13,473 square feet of landscaped area. Of the 10 existing trees in the public right-of-way along W. 27th Street, a minimum of one tree would be removed during construction of the Project, which would be determined at the time of construction

The Applicant is requesting the following discretionary approvals to permit the construction of a 202,200 square-foot parking structure, approximately 48 feet and approximately 4.5 stories in height, to include: a) Up to 750 parking spaces (including 15 ADA accessible spaces) and b) Up to 70 long-term and short-term bicycle parking spaces; (1) Pursuant to LAMC Section §11.5.6, a City-initiated General Plan Amendment (GPA) to change the land use designation of the Site from the existing Low Medium II Residential to the proposed Community Commercial designation; and (2) Pursuant to LAMC Section §12.32.F, Zone Change (ZC) and Height District (HD) change to the zoning height district from the existing RD1.5-1-O to C2-2-O. In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of

Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: site clearing, foundation, building and tenant improvements, and the removal and replacement of street trees.

3.2 Environmental Setting

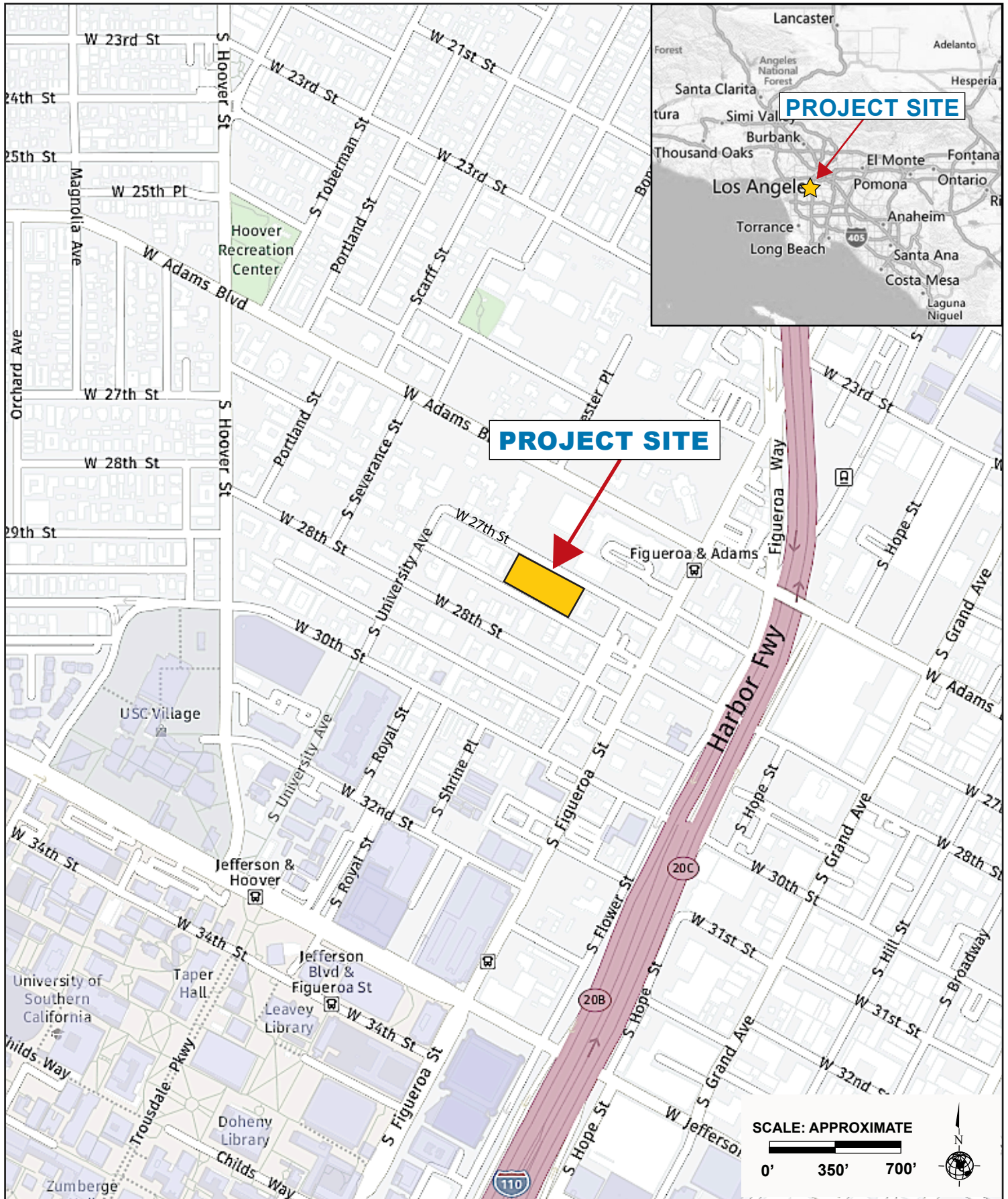
3.2.1 Project Location

The Project Site is located in the South Los Angeles Community Plan area within the City of Los Angeles (City). The Project Site’s location within the City and the greater Los Angeles region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses eight parcels and includes approximately 69,731 square feet of gross lot area (1.6 acres). The Project Site’s property addresses, Assessor’s Parcel Numbers (APN), land use and lot area are summarized in Table 3.1, Summary of the Project Site, below.

**Table 3.1
Summary of Project Site**

Address	APN	Existing Land Use	Lot Area (square feet)
640 W. 27 th Street 642 W. 27 th Street	5123-015-006	Paved Surface Parking Lot	69,731
644 W. 27 th Street 644 ¼ W. 27 th Street 644 ½ W. 27 th Street			
646 W. 27 th Street 646 ¼ W. 27 th Street 646 ½ W. 27 th Street			
650 W. 27 th Street	5123-015-008		
656 W. 27 th Street 658 W. 27 th Street	5123-015-009		
None	5123-016-001		
680 W. 27 th Street 682 W. 27 th Street 684 W. 27 th Street 684 ½ W. 27 th Street 686 W. 27 th Street 686 ½ W. 27 th Street			
700 W. 27 th Street 702 W. 27 th Street 704 W. 27 th Street 704 ½ W. 27 th Street 706 W. 27 th Street 706 ½ W. 27 th Street			

Sources: City of Los Angeles Department of City Planning, Zone Information and Map Access System, website: <http://zimas.lacity.org/>, accessed November 2019.



Source: Yahoo Maps, 2019.



Figure 3.1
Project Location Map

The Project Site is generally bound by W. 27th Street to the north; an alleyway and University of Southern California (USC) fraternity houses to the south; and multi-family residential buildings to the east and west.

Primary vehicular access to the Project Site is provided by the Harbor Freeway (I-110), located approximately 900 feet east of the Project Site. Local street access is provided by W. 27th Street. W. 27th Street is a two-way street providing one travel lane in each direction. W. 27th Street is classified as a Local Street in the City’s Mobility Plan.² Other major nearby roadways that provide access to the Project Site include Figueroa Street and Adams Boulevard. Figueroa Street, located approximately 400 feet east of the Project Site, is a two-way street providing two travel lanes in each direction. Figueroa Street is classified as an Avenue I roadway in the City’s Mobility Plan. Adams Boulevard, located approximately 430 feet north of the Project Site, is a two-way street providing two travel lanes in each direction in the vicinity of the Project Site. Adams Boulevard is designated as an Avenue I roadway in the City’s Mobility Plan.

3.2.2 Existing Conditions

a. Zoning and Land Use Designations

Figure 3.2, Zoning and General Plan Designations, shows the existing and proposed zoning and land use designations on the Project Site and in the surrounding area. The zoning designation for the Project Site is RD1.5-1-O (Restricted Density Multiple Dwelling Zone) with a General Plan land use designation of Low Medium II Residential. The zones corresponding to the Low Medium II Residential designation includes the RD1.5, RD2, and RZ2.5 zones. The Project Site is located in Height District No. 1, which limits height on a RD1.5 zoned property to 45 feet above grade and limits development to a maximum FAR of 3:1.

The Project Site is located within a Transit Priority Area (ZI-2452), South Los Angeles Community Plan area, the Exposition/University Park Redevelopment Plan Area (ZI-2488), the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District (ZI-2397), the South Central Los Angeles Alcohol Sales area (ZI-1231), Freeway Adjacent Advisory Notice for Sensitive Uses (ZI-2427), and the Los Angeles State Enterprise Zone (ZI-2374).

² City of Los Angeles, Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, adopted September 7, 2016, website: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf, accessed August 2020.

b. South Los Angeles Community Plan

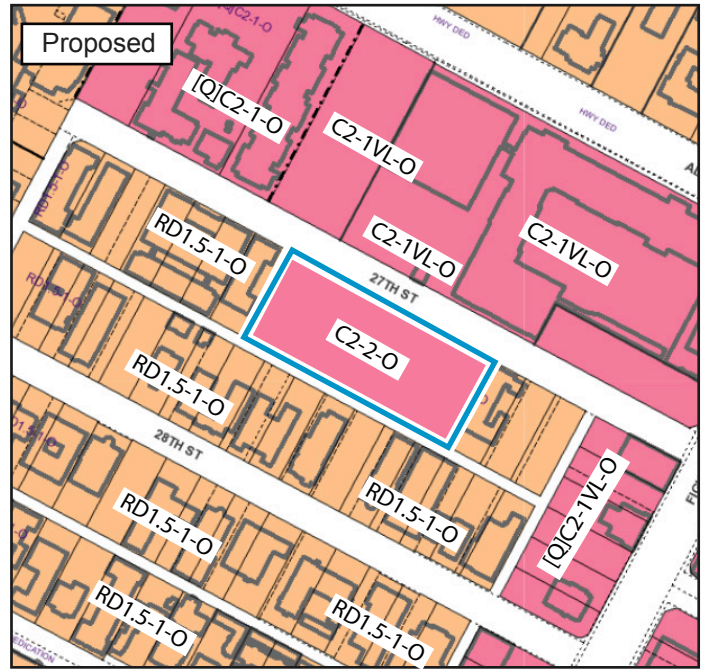
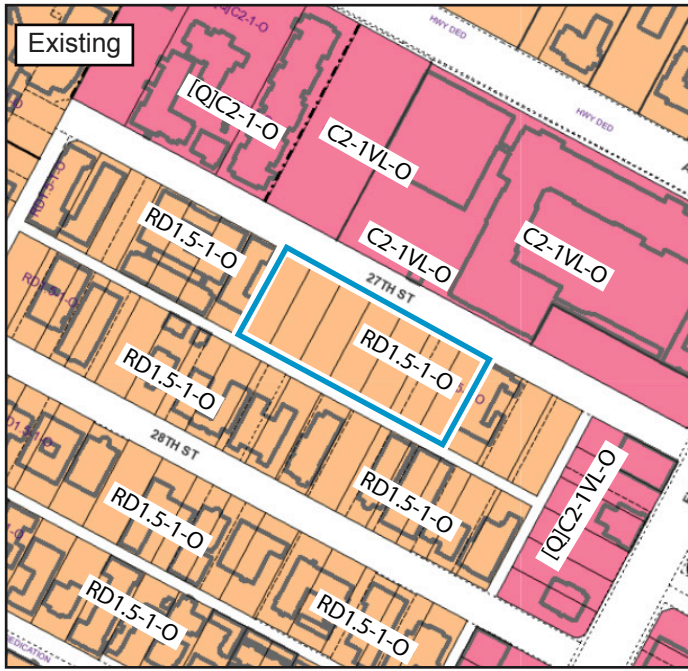
The Project Site is located within the South Los Angeles Community Plan area (South Los Angeles CPA). The South Los Angeles CPA is located approximately three miles southwest of Downtown and covers over fifteen square miles of land area. The South Los Angeles CPA is characterized by diverse neighborhoods rich in cultural and historic character. The South Los Angeles CPA is generally bounded by Pico Boulevard to the north, Figueroa Street and Harbor Freeway (I-110) to the east, Century Boulevard, 105th, 108th and 120th Streets to the south, and Van Ness and Arlington Avenues to the west.

The South Los Angeles Community Plan (Community Plan) was recently updated on November 22, 2017 and became effective December 29, 2018. The Community Plan is a component of the City's General Plan Land Use Element. It outlines a vision for the long-term physical development, economic revitalization, and community enhancement of South Los Angeles, and sets forth actions to achieve the community's vision.

The Community Plan sets a new direction for the future of South Los Angeles. A collaborative effort between City staff and residents, businesses, developers, design professionals, and property owners, the Community Plan sets forth actions to achieve the community's vision. A wide range of planning topics—including land use, housing, parks, open space, urban design, mobility, and arts and culture—are addressed in the Community Plan, encompassing the full spectrum of issues related to South Los Angeles' physical development. The Community Plan serves several important purposes:

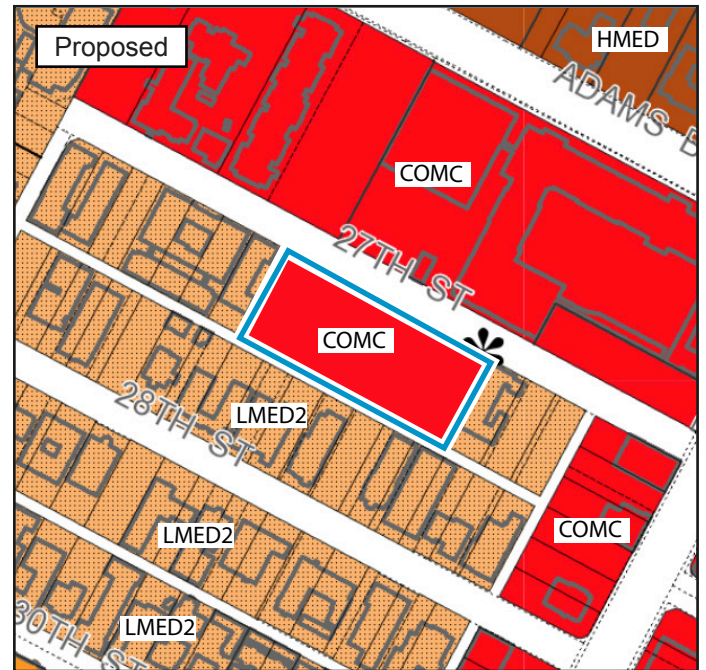
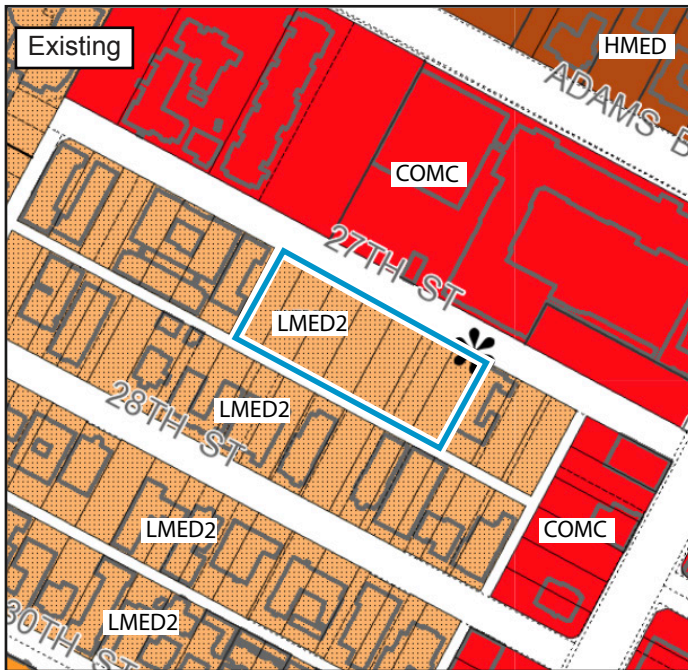
- To outline a vision for the long-term physical and economic development and community enhancement of South Los Angeles;
- To provide strategies and specific implementing actions that will allow this vision to be accomplished;
- To establish a basis for judging whether specific development proposals and public projects are in harmony with Plan policies and standards;
- To direct City departments, other public agencies, and private developers to design projects that enhance the character of the community, taking advantage of its setting and amenities; and
- To provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, design overlays, development standards, the Capital Improvements Program, facilities plans, and redevelopment and area plans.

Zoning Designations



LEGEND Project Site RD1.5 C2

General Plan Land Use Designations



LEGEND Project Site Low Medium II Residential Community Commercial High Medium Residential Cultural / Historic Site

Source: ZIMAS, City of Los Angeles, Department of City Planning, 2019.

c. Exposition/University Park Redevelopment Project

The Project Site is located in the Exposition/University Park Redevelopment Project area, formerly known as the Hoover Redevelopment Project. The Redevelopment Plan was first effective in 1969, the same year that the Project Site began operation as a surface parking lot for AAA. Since then, the Redevelopment Plan has been amended five times. The Project Site was not added to the Redevelopment Project area until the Fourth Amendment dated May 11, 1983.

d. North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District

The Project Site is located within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District, established by Ordinance No. 180,218, effective November 16, 2008. The purpose of the North University Park – Exposition Park - West Adams NSO District is intended to: (A) promote well planned housing to meet the needs of a college/university student housing, and the needs of the community; (B) address impacts of multiple-habitable room projects which may be incompatible with surrounding development; (C) encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects; (D) assure that the project provides adequate on-site parking; and (E) address a concentration of campus-serving housing in the vicinity. Since the Project would not create any university-serving housing, but would provide needed parking to serve the AAA Headquarters, it would not hinder the goals of this NSO District.

e. Existing Site Conditions

Figure 3.3, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.4, Photographs of the Project Site.

The Project Site is currently developed with a paved surface parking lot with 247 parking spaces for the AAA employees at 2601 S. Figueroa Street. The Project Site has been utilized for surface parking for AAA employees since 1969. The Project Site is also bordered by 10 street trees along W. 27th Street. Street parking is available along W. 27th Street with some restrictions.

3.2.3 Surrounding Land Uses

As shown in Figure 3.2, the Project Site is in a residentially zoned “RD1.5-1-O” area, and properties immediately bordering the Project Site are either zoned RD1.5-1-O with General Plan land use designations of Low Medium II Residential or zoned C2-1VL-O with General Plan land use designations of Community Commercial. The properties surrounding the Project Site include commercial office buildings and residential buildings, including USC fraternity houses and multi-family residential buildings. Photographs of the land uses immediately surrounding the Project Site are provided in Figure 3.5, Photographs of Surrounding Uses, Views 7-12. Figure 3.3 shows an aerial photograph of the uses surrounding the Project Site. Below is a description of the existing conditions in the surrounding area.

North: The Project Site is immediately bordered by W. 27th Street to the north. Located further north of W. 27th Street is the three-story AAA Headquarters building located at 2601 S. Figueroa Street. To the west of this building are multi-family residential buildings, ranging from two to four stories above grade. These properties are zoned C2-1VL-O with General Plan land use designations of Community Commercial General Plan land use designations. Refer to Figure 3.5, Views 10 and 11.




West: The Project Site is immediately bordered by multi-family residential buildings to the west. These buildings range from two to three stories above grade. These properties are zoned RD1.5-1-O with General Plan land use designations of Low Medium II Residential. Refer to Figure 3.5, Views 8 and 9.

East: A two-story multi-family residential building immediately borders the Project Site to the east. A surface parking lot, also owned by the Applicant, and a bank are located further east. These properties are zoned RD1.5-1-O with General Plan land use designations of Low Medium II Residential. Refer to Figure 3.5, Views 12.

South: An alleyway immediately borders the Project Site to the south. Fraternity houses associated with the University of Southern California are located south of the alleyway, fronting 28th Street. These residential structures range from one to three stories above grade. These properties are zoned RD1.5-1-O with General Plan land use designations of Low Medium II Residential. Refer to Figure 3.5, View 7.



LEGEND

-  Project Site Boundary
-  Photograph Locations
-  Surrounding Land Uses:
 - 1: AAA Headquarters
2601 S. Figueroa Street
 - 2: Multi-Family Residential
 - 3: Multi-Family Residential
 - 3: Multi-Family Residential and Fraternity Houses

SCALE: APPROXIMATE

0 85' 170'



Source: Google Earth, Aerial View, 2019.



Figure 3.3
Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: Near the western corner inside the Project Site, looking east at the Project Site.



View 2: In the southeastern corner of the Project Site, looking northwest at the Project Site.



View 3: At the northwest corner outside of the Project Site, looking south at the Project Site.



View 4: At the eastern corner outside of the Project Site, looking southwest at the Project Site.



View 5: Inside the alleyway along the southern border of the Project Site, looking east at the Project Site.



View 6: In the middle of the northern border outside of the Project Site, looking south at the Project Site.

Source: Parker Environmental Consultants, 2020.



View 7: On the western corner inside the Project Site, looking southeast at properties south of the Project Site.



View 8: In the northwestern section inside the Project Site, looking northwest at the property to the west of the Project Site.



View 9: On the northern side of 27th Street, looking southwest at properties west and northwest of the Project Site.



View 10: On the southern side of 27th Street, looking northwest at properties northwest of the Project Site.



View 11: On the southern side of 27th Street, looking east at properties north of the Project Site.



View 12: In the southeastern corner inside the Project Site, looking northeast at the property east of the Project Site.

Source: Parker Environmental Consultants, 2020.



Figure 3.5
Photographs of the Surrounding Land Uses
Views 7-12

3.3 Description of Project

3.3.1 Project Overview

The Project includes the site clearing of the surface parking lot and the construction of a 4.5-story parking structure to serve the existing AAA Headquarters building, located at 2601 S. Figueroa Street. The parking structure would replace 247 surface parking spaces with 750 vehicle parking spaces within the proposed parking structure. Additionally, the parking structure would include 35 long-term and 35 short-term bicycle parking spaces, for a total of 70 on-site bicycle parking spaces. The parking structure would include approximately 202,200 gross square feet of structural parking area and reach a height of 48 feet above grade at the top of the parapet. The Project would include rooftop photovoltaic panels extending above the parapet to provide sustainable solar energy to the Project. A summary of the Project is provided in Table 3.2, Proposed Development Program, below. The plan layout of the Project is depicted in Figure 3.6, Plot Plan. The floor plans are illustrated in Figure 3.7 through Figure 3.9.

**Table 3.2
Proposed Development Program**

Land Uses	Proposed Area (square feet)
Existing Uses	
Surface Parking Lot	247 parking spaces 69,731 sf
Proposed Project	
Parking Structure	750 parking spaces 202,200 sf
TOTAL:	202,200 sf
<i>Source: Mutuo, June 19, 2019.</i>	

A. Building Height

The Project is seeking a zone change and height district change from RD1.5-1-O to C2-2D-O. With approval of a height district change, development in Height District No. 2 does not set a specific height limit for development in a C2 zone, but limits development to an FAR of 6:1. However, the Project zoning would also include a D limitation to restrict permitted height on the Site to 48 feet. Since the Project would consist of only a parking structure, FAR limitations are not applicable to the Project. The proposed parking structure would be 4.5 stories above grade with rooftop parking. The parking structure is planned for a maximum height of 48 feet above grade at the top of the parapet, not including rooftop mechanical and solar features as allowed by the LAMC.

Refer to Figure 3.10 through Figure 3.12 for the elevations of the proposed building. Illustrations depicting the building sections of the Project are provided in Figure 3.13.

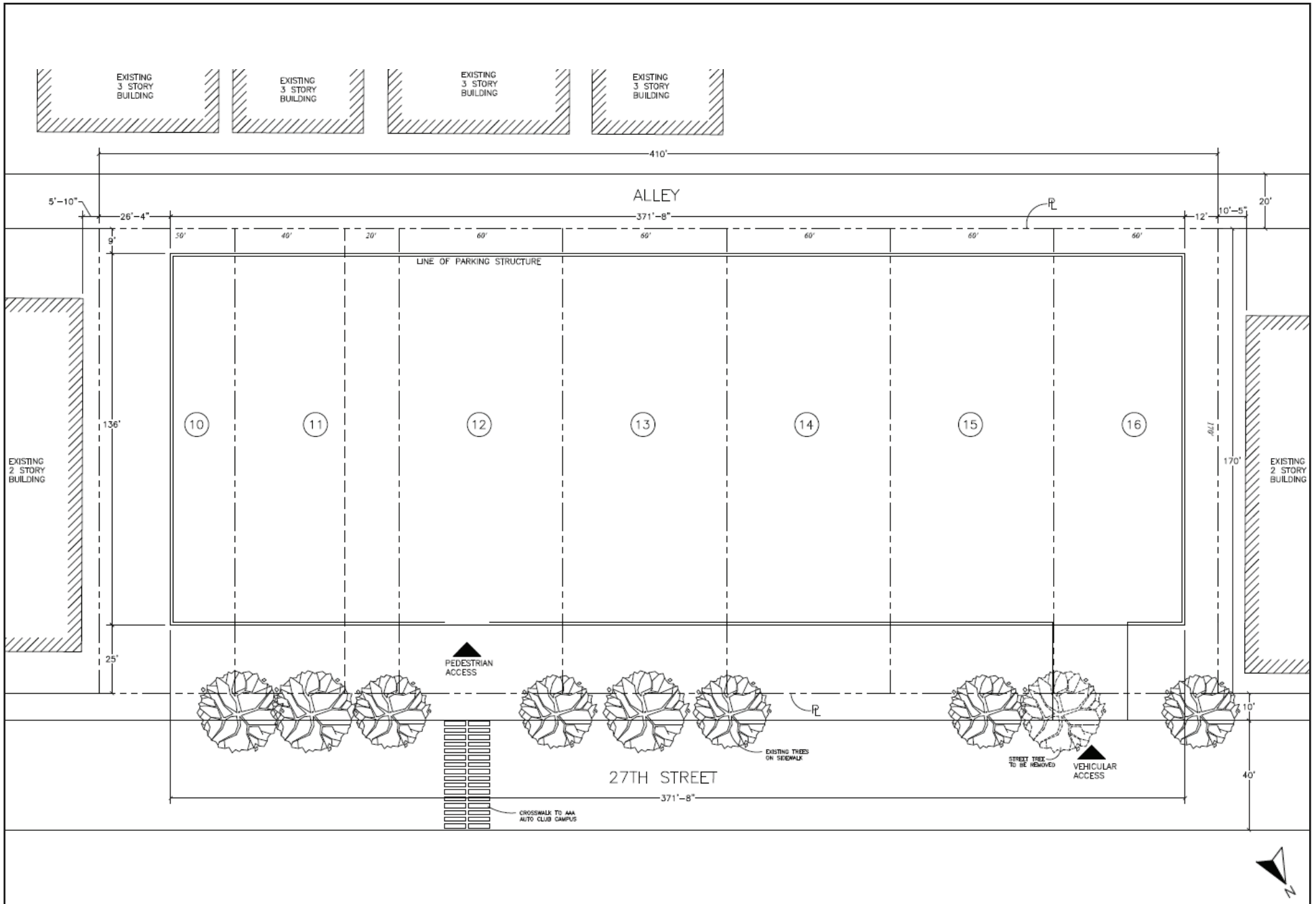
B. Setbacks

Pursuant to LAMC Section 12.14.C, no front, side, or rear yard setbacks are required in the C2 Zone for commercial developments. As such, the Project would not be required to provide setbacks along any property line. Nevertheless, the Project would include the following setbacks: a 25-foot front yard setback along the northern property line fronting W. 27th Street, a 12-foot side yard setback along the western property line, a 26-foot and 4-inch side yard setback along the eastern property line, and a 9-foot rear yard setback along the southern property line fronting the alley.

3.3.2 Design and Architecture

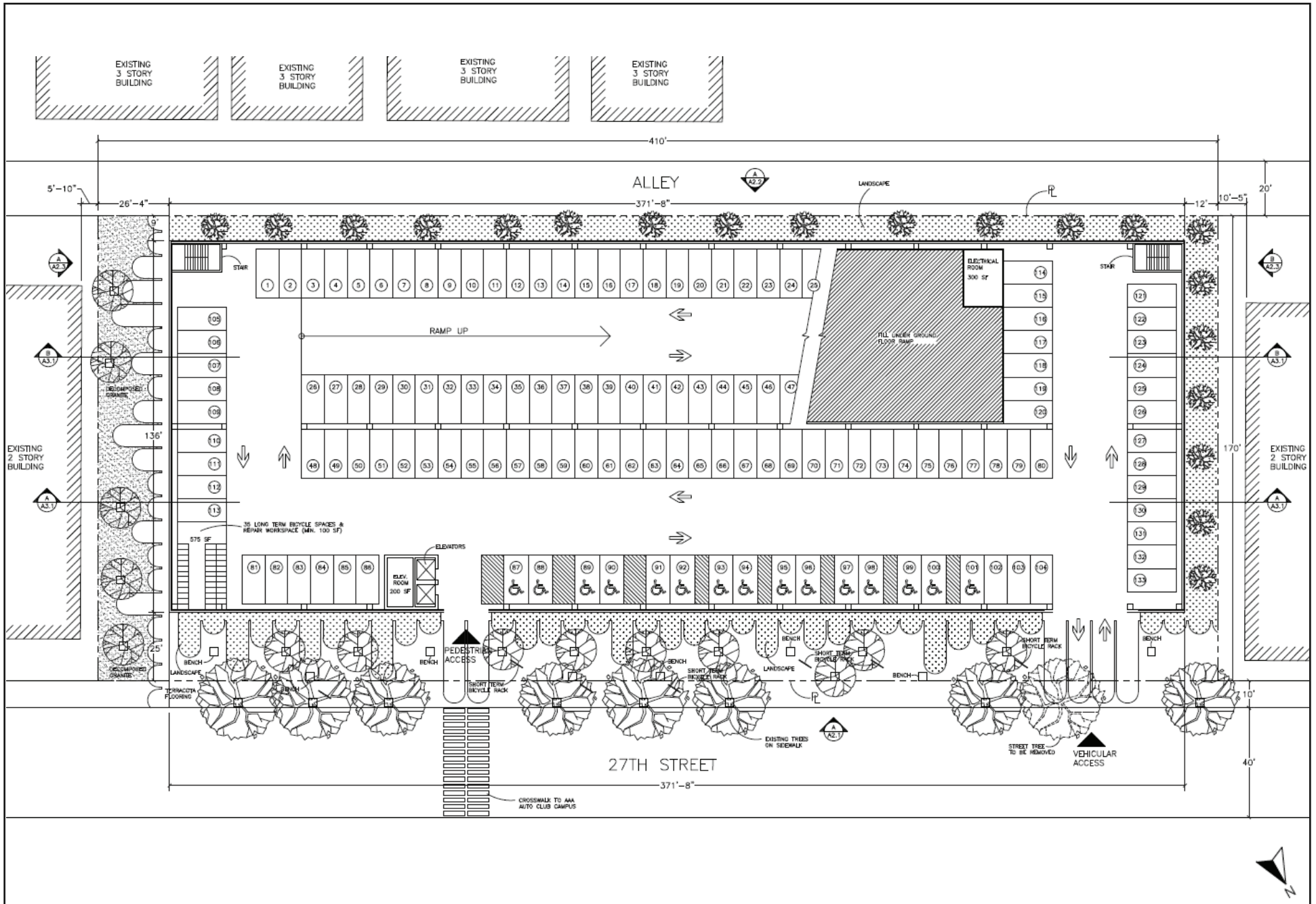
The Project is a mid-rise (4.5-story) parking structure designed with modern architectural materials including perforated metal, concrete arches, and glazed tiles. At its maximum height, the proposed building would be consistent with other commercial building heights in the vicinity, including the four-story AAA Headquarters building, located north of the Project Site and surrounding multi-family residential buildings that range from one to four stories above grade.

The Project features a modern design inspired by the historic 1923 AAA Headquarters designed by Sumner Hunt and Silas Burns in the Spanish Colonial Revival style. The Project's W. 27th Street façade features arch-like formations that echo the arches incorporated into the design of the AAA Headquarters building. The entire ground floor as well as the rear facade features 4 by 4 inch mesh steel for creeping myrtle to screen the parking structure from the neighboring residential buildings as well as secure ground floor access to the structure. Trees planted along the east and west facades of the Project also screen the parking structure from the adjacent apartment buildings on W. 27th Street. The Project would be consistent with the design guidelines in the recently approved South Los Angeles Community Plan Update (Community Plan Update). Architectural renderings are illustrated in Figure 3.14.

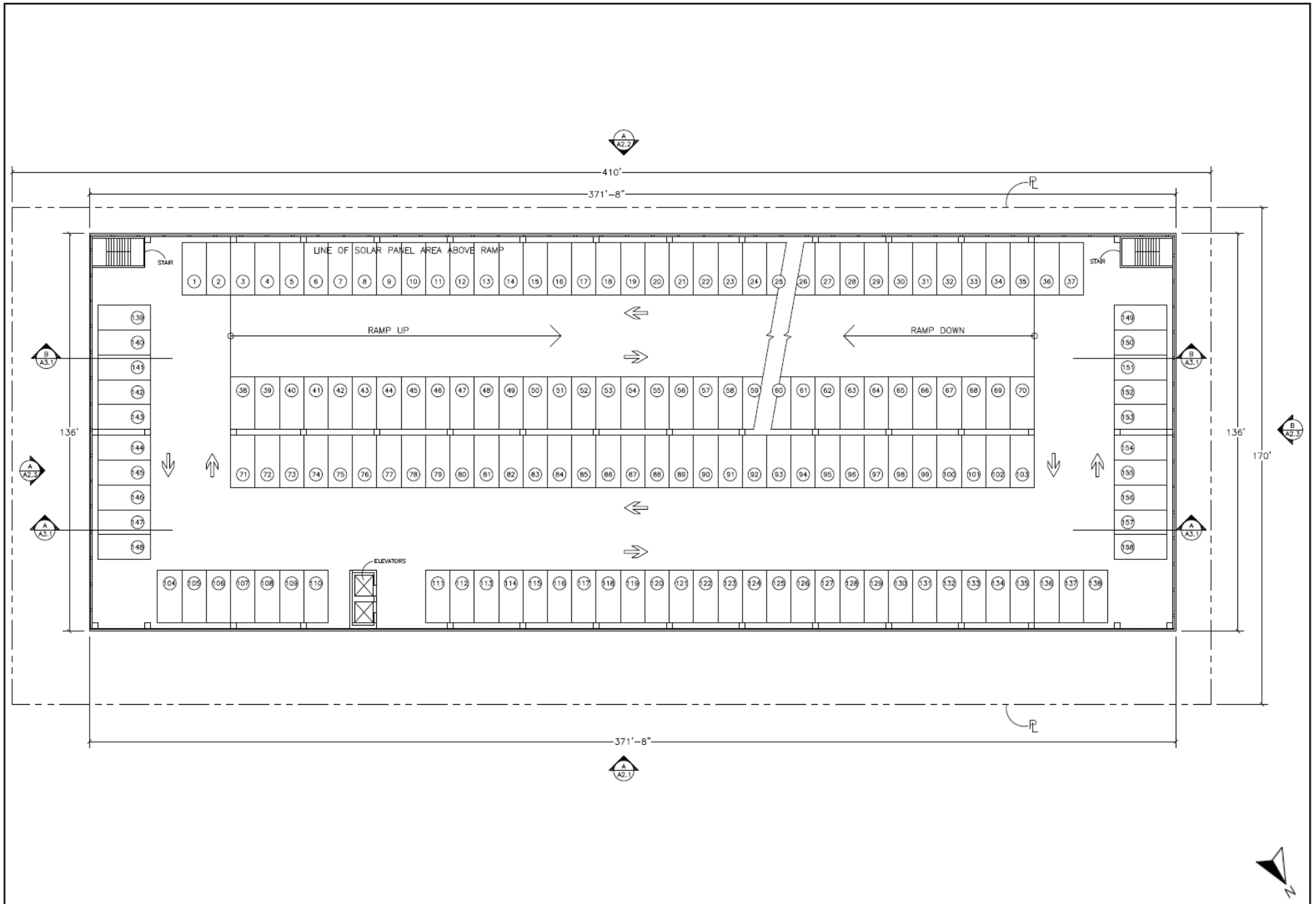


Source: Mutuo, June 19, 2020.

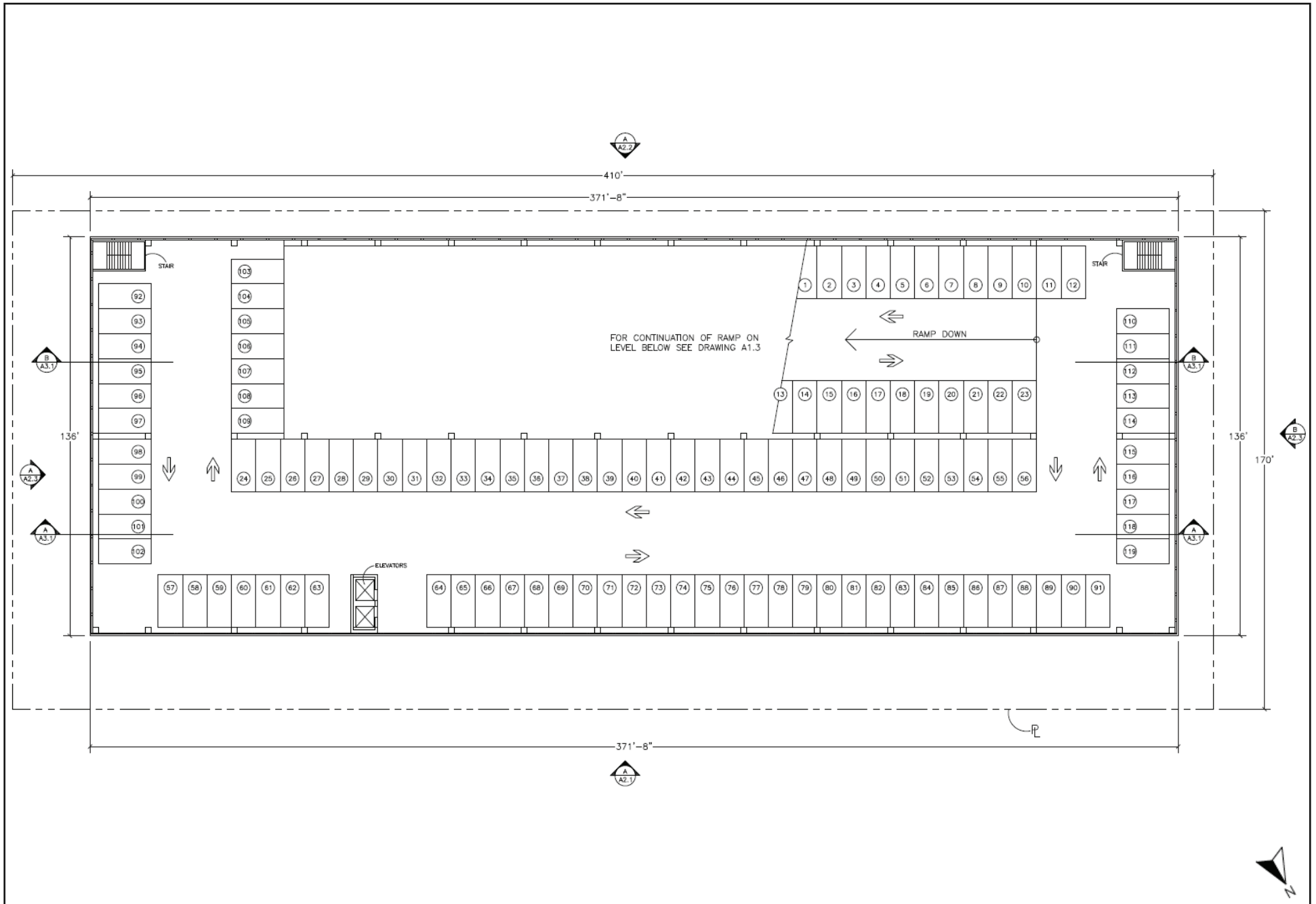
Figure 3.6
Plot Plan



Source: Mutuo, June 19, 2020.

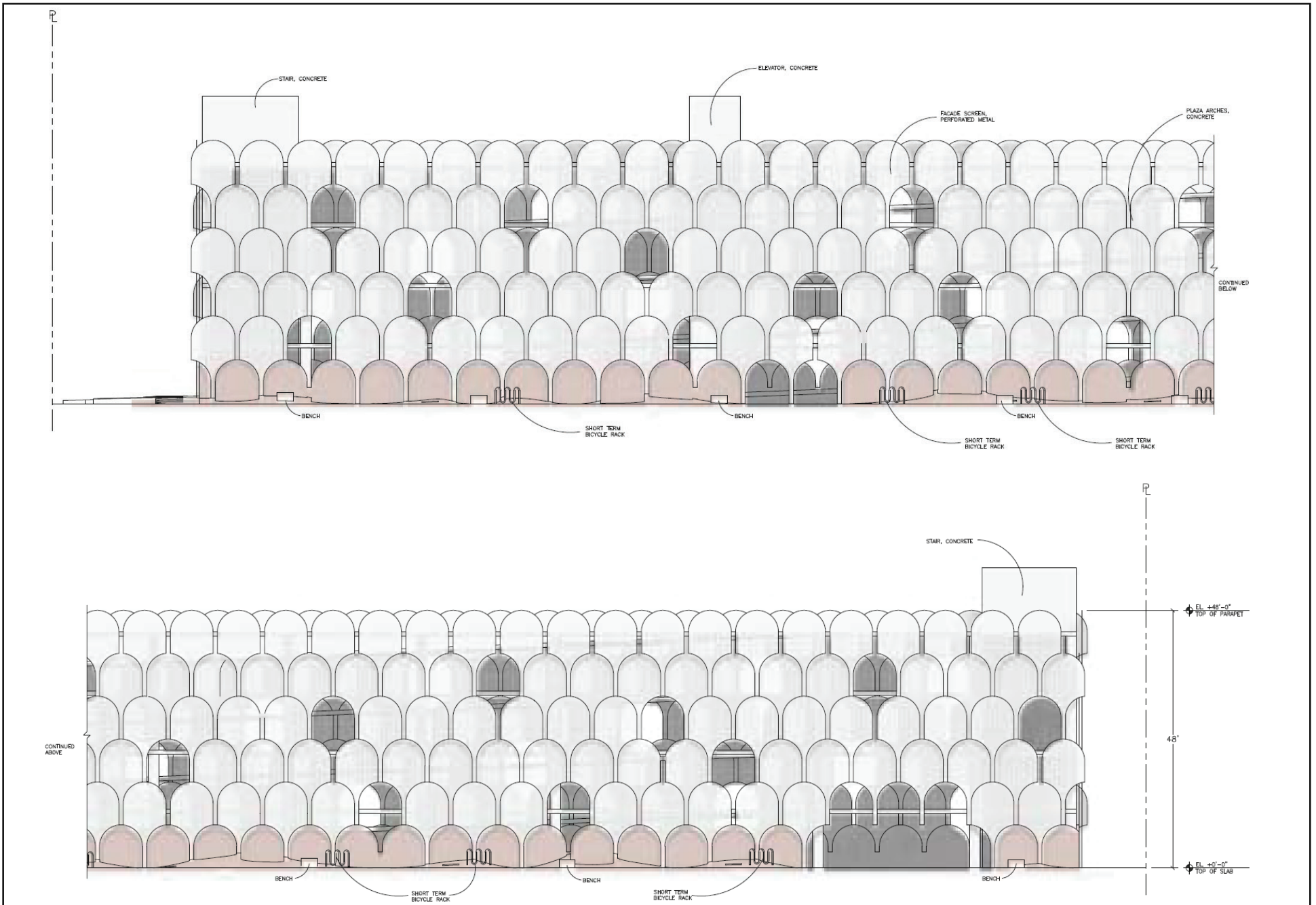


Source: Mutuo, June 19, 2020.

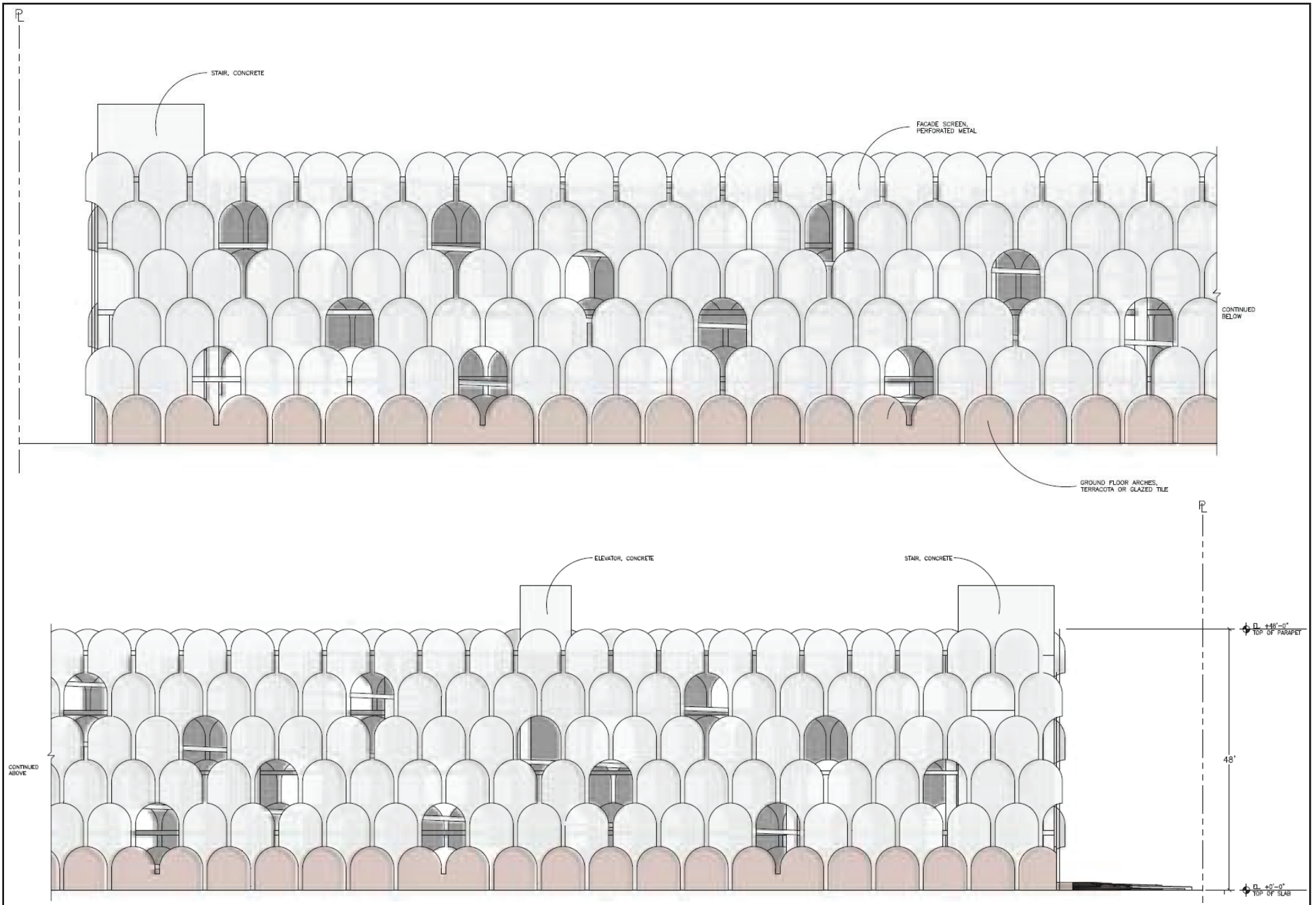


Source: Mutuo, June 19, 2020.

Figure 3.9
Roof Floor Plan

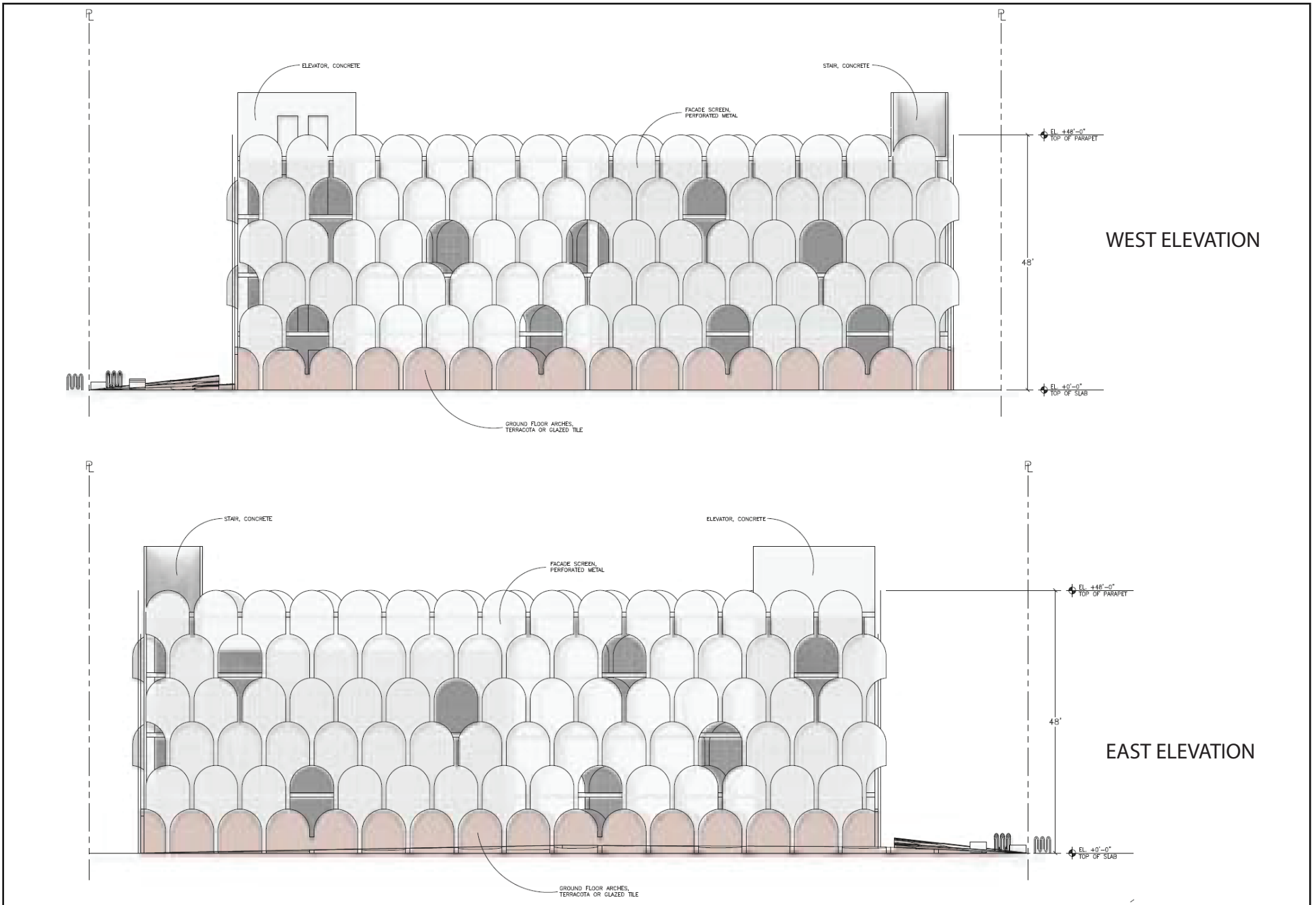


Source: Mutuo, June 19, 2020.

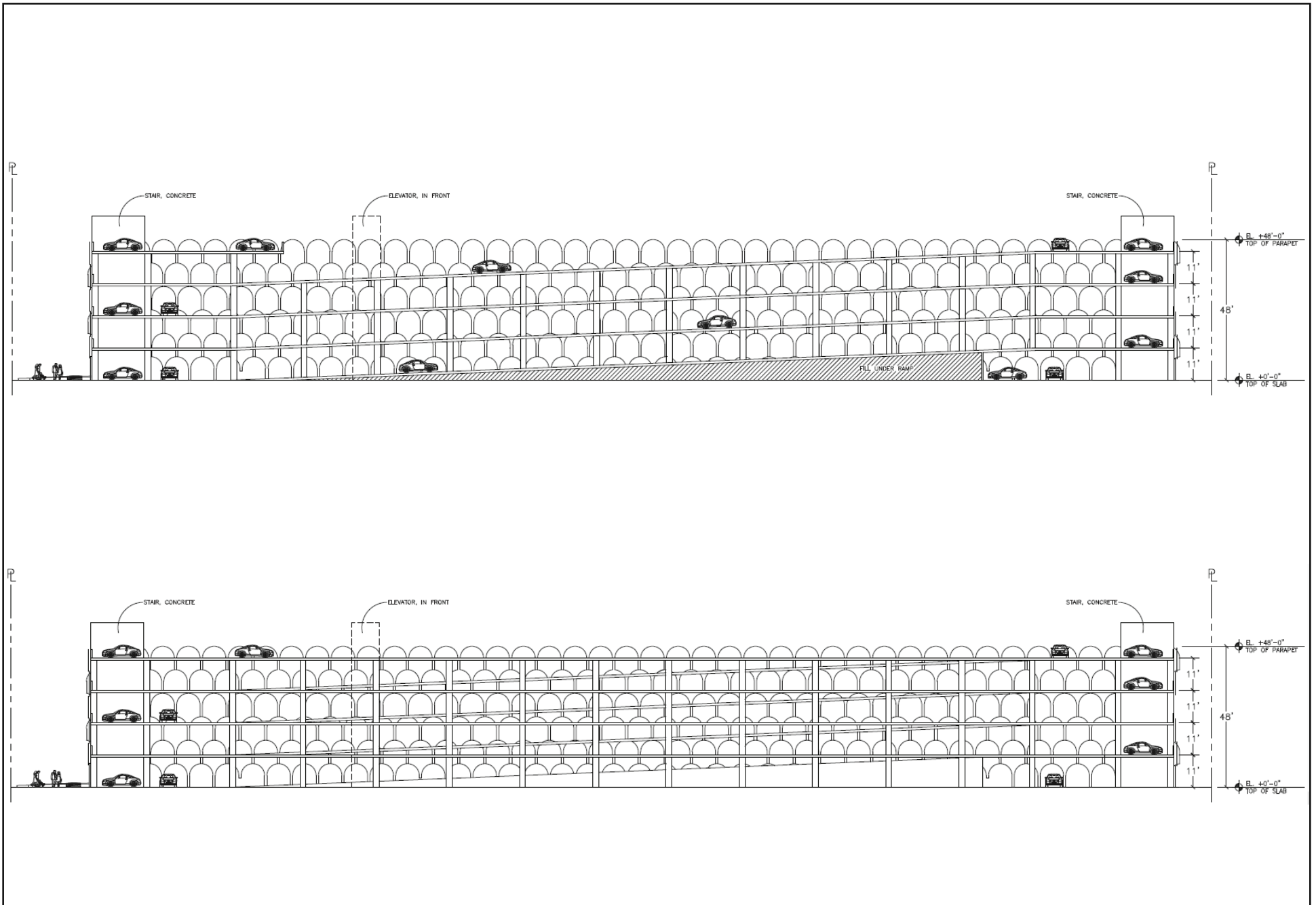


Source: Mutuo, June 19, 2020.

Figure 3.11
South Elevation



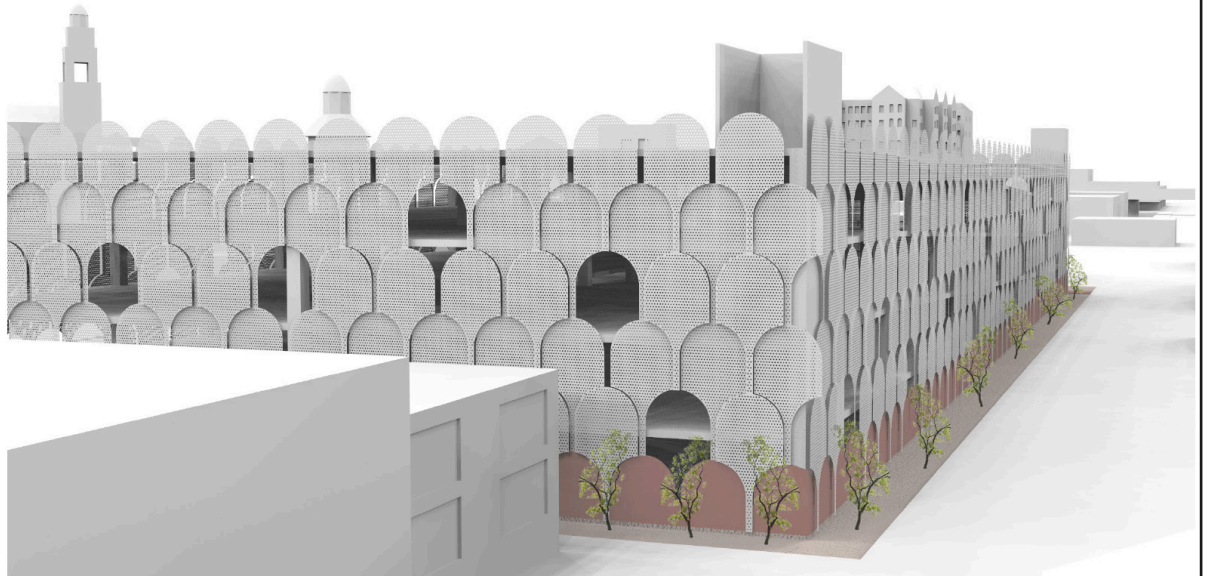
Source: Mutuo, June 19, 2020.



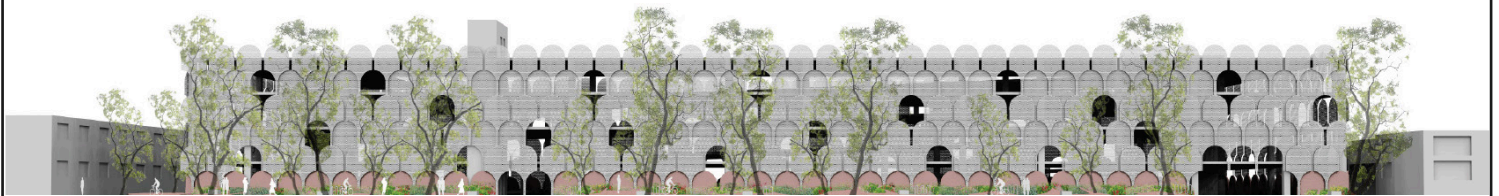
Source: Mutuo, June 19, 2020.



View from 27th Street



View from Alley



27th Street Elevation

Source: Mutuo, June 19, 2020.

3.3.3 Open Space and Landscaping

The Project includes the construction of a parking structure. Thus, the Project is not required to provide open space. Nevertheless, the Project would include ground level landscaped areas. The Project would include approximately 19,181 square feet of open space, including 13,473 square feet of landscaped area. Of the 10 existing trees in the public right-of-way along W. 27th Street, a minimum of one tree would be removed during construction of the Project, which would be determined at the time of construction. Any tree removals would be replaced as required by LAMC and Urban Forestry. The ground level open space and landscaped areas are shown in Figure 3.7, Ground Floor Plan.

3.3.4 Access, Circulation, and Parking

The Project would increase the number of parking spaces for the existing AAA Headquarters building, located north of the Project Site at 2601 S. Figueroa Street. Vehicular access to the Project Site would be provided via one full-access driveway along W. 27th Street, on the northwest corner of the Project Site. A pedestrian crosswalk would be located through W. 27th Street to provide pedestrian access between the proposed parking structure and the AAA Headquarters building.

Since the Project is an ancillary development to an existing building, the Project is not required to provide a specific number of vehicle or bicycle parking spaces, pursuant to the LAMC. The adjacent AAA building is an existing and operational structure in compliance with the LAMC. The parking structure will be provided solely for the use of AAA employees working at the LA Headquarters.

The Project would replace 247 surface parking spaces with 750 parking spaces, resulting in a net increase of 503 parking spaces. The parking structure would also include 70 total bicycle parking spaces: 35 long-term and 35 short-term bicycle spaces.

3.3.5 Lighting and Signage

The Project would provide ample lighting both externally and internally in order to maintain visibility in and around the structure and to prevent any illegal activity near the Project Site. The Project is designed with a façade screen made of perforated metal and protruding arches. The proposed design of the façade screen would be predominantly grey with light red color along the lower periphery to complement the AAA Headquarters. The façade screen, landscaping, and internal barrier would prevent light from vehicles from escaping the structure.

All exterior lighting would meet all applicable LAMC standards and be shielded or directed toward the areas to be illuminated. LAMC standards require that all exterior lighting on the Project Site would not illuminate adjacent properties. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to the approval of the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

All signage on the parking structure would comply with all applicable LAMC standards.

3.3.6 Anticipated Construction Schedule

For purposes of analyzing impacts associated with air quality, this analysis assumes a Project construction schedule of approximately 12 months, with final buildout occurring in 2021. Construction activities associated with the Project would be undertaken in three main steps: (1) site clearing/preparation; (2) building construction; and (3) finishing and architectural coatings. All construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. As provided in Section 41.40 of LAMC, the permissible hours of construction within the City are 7:00 A.M. to 9:00 P.M. Monday through Friday, and between 8:00 A.M. and 6:00 P.M. on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

Site Clearing / Preparations Phase

This phase would include the site clearing of the surface parking areas of the Project Site. In addition, this phase may include the removal of fences and associated debris. Additionally, minimal surface grading would be necessary to ensure the proper base and slope for the building foundations. The site clearing/preparations phase would be completed in approximately one month.

Building Construction Phase

The building construction phase consists of constructing the above grade structure and is expected to occur for approximately nine months. The building construction phase includes the construction of the proposed building, connection of utilities to the parking structure, building foundations, laying irrigation for landscaping, and landscaping the Project Site.

Finishing/Architectural Coating Phase

The finishing/architectural coating phase is expected to occur over approximately two months. During this phase, interior striping and exterior wall finishing and paint would be applied.

Temporary Right-of-Way Encroachment

Construction activities would necessitate temporary lane closures on W. 27th Street, adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction activities as may be required. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on-site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Traffic lane and right-of-way closures, including sidewalks, if required, would be properly permitted by the City agencies and would conform to City standards.

As discussed further in the Transportation analysis below, a Construction Management Plan would be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work. The plans shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. All construction related traffic shall be restricted to off-peak hours. In accordance with City policy, pedestrian routes on W. 27th Street and the alleyway, adjacent to the Project Site, will be maintained and protected from the active construction site. Temporary detours would be coordinated with the City on an as needed basis.

Haul Route

All construction and demolition debris would be recycled to the maximum extent feasible. There are two dozen construction debris waste transfer stations located throughout the southern California region. The nearest waste transfer stations to the Project Site that accepts concrete and asphalt are the 25th Street Recycling facilities, located approximately 3 miles east of the Project Site and the Waste Management Downtown Diversion facility, located approximately 4 miles east of the Project Site. Demolition debris and soil materials from the Project Site that cannot be recycled or diverted would be hauled to the Sunshine Canyon landfill, which accepts construction

and demolition debris and inert waste from areas within the City. The Sunshine Canyon Landfill is approximately 29 miles north of the Project Site (approx. 58 miles round trip).³

The local haul route exiting the Project Site to Sunshine Canyon Landfill would travel north along Figueroa Street and west along 18th Street to I-110 Freeway on-ramp. The haul route exiting the I-110 Freeway would exit the Figueroa Street off-ramp and travel east along Figueroa Street and W. 27th Street to the Project Site. The haul route to the 25th Street Recycling facility or Waste Management Downtown Diversion facility would travel along north along Figueroa Street, and utilize the 18th Street on-ramp to the I-10 Freeway.

3.3.7 Related Projects

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project’s cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

“(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable. “Cumulatively considerable” means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(2) A lead agency may determine in an initial study that a project’s contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

(3) A lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural

³ Construction and Demolition Debris Recycling Facilities in Los Angeles County, updated September 17, 2019, website: https://dpw.lacounty.gov/epd/CD/cd_attachments/Recycling_Facilities.pdf, accessed November 2019.

community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

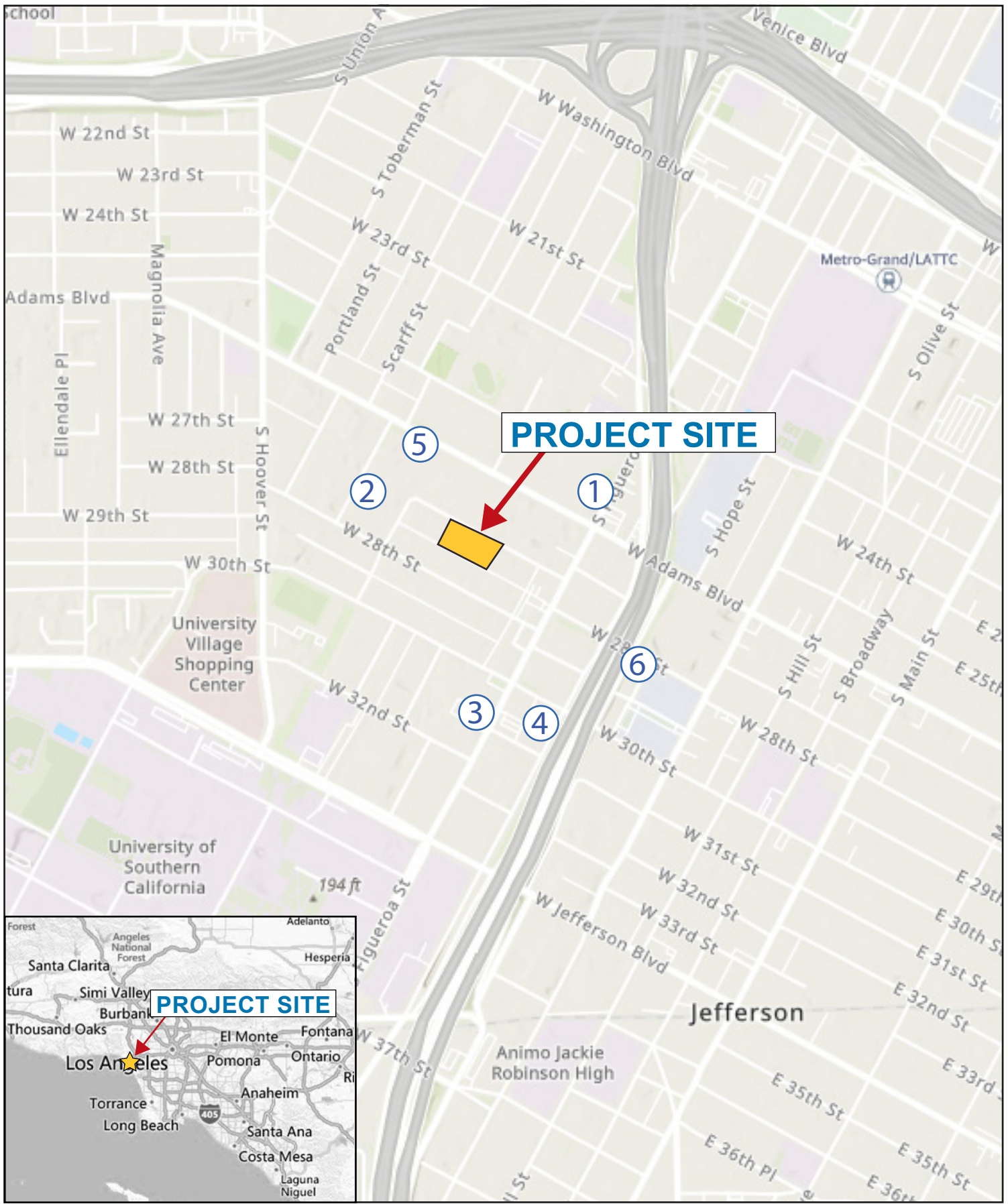
(4) The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable."

In light of the guidance summarized above, an adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

The related projects identified are included in Table 3.3, Related Projects List, below. A total of six related projects were identified within the vicinity of the Project Site. An analysis of the cumulative impacts associated with these related projects and the Project are provided under each individual environmental impact category in Section 4 of this IS/MND. The locations of the related projects are shown in Figure 3.15, Location of Related Projects.

**Table 3.3
Related Projects List**

Project Number	Project Name	Location/Address	Project Description	Size	Units
City of Los Angeles Projects ^a					
1	Figueroa & Adams student housing	2455 S Figueroa Street	Apartment units	145	du
2	USC Children's Creative Learning Center	2716 S Severance Street	Child care center expansion	9,955	sf
3	Figueroa Hotel	3101 S Figueroa Street	Hotel	275	room
			Bar	1,175	sf
4	USC Student Housing	505 W 31 st Street	Apartment units & affordable housing units	67	du
5	806 W Adams Boulevard	806 W Adams Boulevard	Student housing (495 total bedrooms)	99	du
6	CD9 Hope Street Housing	2817 S Hope Street	Beds	102	beds
<p><i>Notes:</i> <i>du = dwelling unit, sf = square feet, stu = student.</i> ^a <i>Related Project list based on information provided by LADOT on April 15, 2020.</i> <i>Source: Gibson Transportation Consulting Inc., April 20, 2020.</i></p>					



Source: Gibson Transportation Consulting, 2020.



Figure 3.15
Location of Related Projects

3.4 Requested Permits and Approvals

The list below includes the anticipated requests for approval of the construction of a 202,200 square-foot parking structure, approximately 48 feet and approximately 4.5 stories in height, to include: (a) up to 750 parking spaces (including 15 ADA accessible spaces) and (b) up to 70 long-term and short-term bicycle parking spaces. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- (1) Pursuant to LAMC Section §11.5.6, a City-initiated General Plan Amendment (GPA) to change the land use designation of the Site from the existing Low Medium II Residential to Community Commercial designation; and
- (2) Pursuant to LAMC Section §12.32.F, Zone Change (ZC) and Height District (HD) change to the zoning height district from the existing RD1.5-1-O to C2-2D-O.

In addition, pursuant to various sections of the LAMC, the Applicant will also request various ministerial administrative approvals and permits from the Los Angeles Department of Building and Safety and other municipal agencies for project construction actions, including but not limited to the following: site clearing, foundation, building and tenant improvements.

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Section 4. Environmental Checklist and Impact Analysis

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, (C.C.R. Title 14, Chapter 3, 15000-15387), as amended on January 1, 2019.

I. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Several regulatory plans, policies, and guidance documents exist that guide development in a manner that affects the visual and aesthetic characteristics of the Project Site and surrounding area. In addition to the applicable provisions of the Los Angeles Planning and Zoning Code, which regulate setbacks, open space requirements, signage and lighting standards, and landscaping standards, the following planning documents influence the visual character of development on the Project Site and development in the proposed Project's vicinity: the City's General Plan (including the General Plan Framework and the South Los Angeles Community Plan), the Exposition/University Park Redevelopment Project Plan (ZI-2488), the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District (ZI-2397), and the LAMC.

Project Impact Analysis

a) Have a substantial adverse effect on a scenic vista?

No Impact. A significant impact may occur if the Project includes a proposal to develop or allow development in an existing natural open space area or has the potential to introduce features that would block or detract from the existing valued aesthetic quality of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

As shown in the site photographs depicted in Figure 3.4, Photographs of the Project Site, and Figure 3.5, Photographs of the Surrounding Uses, the Project Site is currently occupied by a surface parking lot. The Project would include the site clearing of the Project Site to allow for the development and operation of a 4.5-story parking structure. Views in the vicinity of the Project Site are largely constrained by adjacent buildings. No locally designated or protected scenic views are provided from or through the Project Site. The Project is located in an urbanized area of the South Los Angeles CPA. The Project would not block or detract from the existing valued aesthetic quality of a public scenic vista. Therefore, the Project would have no impact associated with a substantial adverse effect on a scenic vista without mitigation.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

Less Than Significant Impact. A significant impact may occur if scenic resources would be damaged and/or removed by development of a project. The Project is not

within a designated state scenic highway. There are no rock outcroppings on the Project Site. The Project Site is currently developed with a surface parking lot. As such, no buildings, structures, or other property types that could be considered eligible for listing in the National Register of Historic Places, California Register of Historical Resources, or as a Los Angeles Historic-Cultural Monument occur on-site. Therefore, there are no known or potential historic resources on the Project Site.

There are no significant trees or unique geologic features on-site. The Project Site is not bordered by or within the viewshed of any designated scenic highway as identified in the Mobility Element of the City of Los Angeles General Plan.⁴ Further, there are two historic resources in the immediate Project Site area: the Automobile Club of Southern California building, located at 2601 W. 27th Street, just north of the Project Site and the Shankland House, located at 715 W. 28th Street, to the southwest of the Project Site.⁵ W. 27th Street and the southern alleyway separate these historic properties from the Project Site, respectively. Therefore, as discussed in more detail in Section V, Cultural Resources, development of the Project would not negatively affect the physical integrity of any historical resource. Therefore, the Project would have a less than significant impact to scenic resources, historical structures, and scenic highways and would not require mitigation.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. A significant impact may occur if the Project were to introduce features that would detract from the existing valued aesthetic quality of a neighborhood, community, or localized area by conflicting with important aesthetic elements or the quality of the area (such as theme, style, setbacks, density, massing, etc.) or by being inconsistent with applicable design guidelines.

The Project would be required to comply with all applicable building code requirements, including the Los Angeles Municipal Code (LAMC), which requires every building, structure, or portion thereof, to be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material. In addition, the removal of graffiti is required pursuant to LAMC Section

⁴ *City of Los Angeles, Department of City Planning, Mobility Plan 2035: An Element of the General Plan, September 7, 2016.*

⁵ *Historic Places LA, Los Angeles Historic Resources Inventory, Map View, website: <http://historicplacesla.org/map>, accessed December 2019.*

91.8104.15, which requires that the exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley. The City also requires the Applicant to affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS." Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier. The Applicant is responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

The Project would not be out of character with the surrounding land uses since it would replace an existing surface parking lot with an above-grade parking structure. Additionally, the Project would be designed to comply with applicable design guidelines, which would ensure that the Project is visually compatible with the surrounding land uses. The Project features a modern design inspired by the historic 1923 AAA Headquarters designed by Sumner Hunt and Silas Burns in the Spanish Colonial Revival style. The Project's W. 27th Street facade includes vertical pieces made of painted aluminum square tubes arranged in an arch formation that echoes the arches incorporated into the design of the AAA Headquarters. The entire ground floor as well as the rear facade features 4 by 4-inch mesh steel for creeping myrtle to screen the parking structure from the neighboring residential buildings as well as secure ground floor access to the structure. Trees planted along the east and west facades of the Project also screen the parking structure from the adjacent apartment buildings on W. 27th Street. The Project would be consistent with the design guidelines in the recently approved South Los Angeles Community Plan Update, such as screening parking with landscaping and including electric vehicle charging stations. Additionally, the Project would be in compliance with any design limitations established in the LAMC with approval of the entitlement requests. Therefore, the Project would be consistent with the applicable design guidelines. Thus, impacts related to the general aesthetic appearance, upkeep, and visual character of the Project would be less than significant without mitigation.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if the Project introduces new sources of light or glare on or from the Project Site, which would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The determination of whether the Project results in a significant nighttime illumination impact shall be made considering the following factors: (a) the change in ambient illumination levels as a result of proposed project sources; and (b) the extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

Lighting for the Project would be provided in order to illuminate the parking structure entrances and parking areas largely to provide adequate nighttime visibility for patrons, guests, and employees and to provide a measure of security. All outdoor lighting would be designed and installed with shielding, such that the light source cannot be seen from adjacent residential properties or the public right-of-way. To ensure that lighting sources are not directly visible by adjacent properties, the Project's lighting fixtures would be installed and operated in accordance with Section 99.12.508 – Table A5-602 (Light Pollution Reduction) of the City's Green Building Code (which requires outdoor lighting systems to be designed and installed to comply with the minimum requirements in the California Energy Code, or comply with a local ordinance, whichever is more stringent). The Project would not generate a substantial increase in ambient lighting as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses.

Current vehicular access to the Project Site is provided by four full-access vehicle driveways along W. 27th Street. Vehicular access to the proposed parking structure would be provided via one full-access driveway along W. 27th Street. The proposed parking spaces would be directed on all four sides of the parking structure, which would direct vehicular headlights towards all surrounding land uses. However, the proposed mesh steel facades and interior structure would prevent headlights from impacting the residential land uses to the east, west, and south of the Project Site. Additionally, a moderate degree of illumination already exists in the Project vicinity in the form of streetlights, building lighting, and car headlights along W. 27th Street. As such, vehicles leaving the Project Site would not substantially increase light in the Project area. Therefore, headlights from vehicles entering or exiting the Project Site along W. 27th Street would not adversely impact surrounding land uses. The Project would not introduce any new sources of substantial light that are incompatible with the surrounding area. Thus, the Project would not generate a substantial increase in ambient lighting, as the majority of lighting would be directed towards the interior of the Project Site and away from any nearby land uses. Therefore, the Project's impacts related to lighting would be less than significant without mitigation.

Glare

Potential reflective surfaces in the Project vicinity include automobiles traveling and parked on streets, exterior building windows, and surfaces of brightly painted buildings. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. The Project would not introduce any new substantial sources of glare that are incompatible with the surrounding area. Additionally, as discussed above, the Project would not substantially increase light in the Project area that may

contribute to glare. The Project is located in a highly urbanized and developed area, and the Project's proposed architectural materials and landscaping would prevent unnecessary glare, as shown in Figure 3.7 in Section 3, Project Description. The Project's landscaped green areas would serve to reduce the building's heat gain and reflective glare potential. Therefore, the Project's potential impacts related to glare would be at a less than significant level without mitigation.

Mitigation Measures

Project impacts with regard to aesthetics would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects would result in an intensification of existing prevailing land uses within the South Los Angeles Community in the City. Development of the related projects is expected to occur in accordance with adopted plans and regulations. With respect to the overall visual quality of the surrounding neighborhood, some of the related projects would be subject to site plan review (SPR) by the Los Angeles Department of City Planning (DCP) for review and approval, as may be applicable. The SPR process would ensure each project is designed and constructed in a manner that is consistent with and compatible with the existing urban form and character of the surrounding environment. Therefore, cumulative aesthetic impacts would be less than significant without mitigation.

II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulatory Setting

The California Department of Conservation, Division of Land Resource Protection provides area maps and documents that guide development in a manner that affects agricultural resources. The following maps and documents influence development within the Los Angeles County: the California Department of Conservation, Division of Land Resource Protection’s “Los Angeles County Important Farmland 2016” map and the 2016-2017 Williamson Act Status Report.

Project Impact Analysis

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. The Project Site is currently occupied by a surface parking lot. The Project Site is also located in an urbanized area of the City. No farmland or agricultural activity exists on the Project Site, nor are there any farmland or agricultural activities in the vicinity of the Project Site. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not a candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁶ Therefore, no impact to agricultural lands would occur.

- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

No Impact. The Project Site is located within the jurisdiction of the City and is, therefore, subject to the applicable land use and zoning requirements in the LAMC. The Project Site is zoned RD1.5-.1.O with a General Plan land use designation of Low Medium II Residential. The Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.⁷ Therefore, no impact would occur.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No Impact. The Project Site is zoned RD1.5-.1.O with a General Plan land use designation of Low Medium II Residential in the Community Plan. The Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. Therefore, no impact would occur.

⁶ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed November 2019.

⁷ Williamson Act Program, California Division of Land Resource Protection, website <https://www.conservation.ca.gov/dlrp/wa/Pages/Index.aspx>, accessed November 2019.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The portion of the Project Site proposed to be developed with the Project is occupied by a surface parking lot. The Project Site is also located in an urbanized area of the City. No forested lands exist on or in the vicinity of the Project Site. Therefore, no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. As discussed above, the Project Site is not classified in any “Farmland” category designated by the State of California. According to the “Los Angeles County Important Farmland 2016” map, which was prepared by the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site are not candidates for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impact would occur.

Mitigation Measures

Project-level impacts would have no impact to agricultural lands, forests, or timberland uses. Therefore, no mitigation measures are required.

Cumulative Impacts

No Impact. Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of any forest land or conversion of forest land to non-forest use. The “Los Angeles County Important Farmland 2016 Map” maintained by the California Division of Land Resource Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category.⁸ The Project Site is located in an urbanized area in the South Los Angeles CPA within the City and does not include any State-designated agricultural lands or forest or timberland uses. Therefore, no cumulative impact would occur.

⁸ *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2016, Map. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed November 2019.*

III. Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Air quality in the United States is governed by the federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA).

The U.S. Environmental Protection Agency (EPA) is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives.

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets CAAQS, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. The CARB

establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. In some cases, the state standards are more restrictive than the federal standards established under the CAA.

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin. To that end, the SCAQMD, a regional agency, works directly with SCAG, county transportation commissions and local governments, and cooperates actively with state and federal government agencies. The SCAQMD develops air quality related rules and regulations, establishes permitting requirements, inspects emissions sources, and provides regulatory enforcement through such measures as educational programs or fines, when necessary. The SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and state ambient air quality standards (CAA and CCAA discussed above). SCAQMD has responded to this requirement by preparing a series of AQMPs. SCAQMD staff also develops rules based on control measures identified in the AQMP and which are designed to reduce air pollution from specific sources. SCAQMD compliance staff conduct regular inspections of businesses to ensure equipment and processes are operating in compliance with applicable clean air rules and regulations.

Project Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. A significant air quality impact could occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. The most recent AQMP was adopted by the Governing Board of the South Coast Air Quality Management District (SCAQMD) on March 3, 2017 (“2016 AQMP”). The 2016 AQMP represents a thorough analysis of existing and potential regulatory control options, includes available, proven, and cost-effective strategies, and seeks to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gasses and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and incentives that encourage the accelerated transition to cleaner vehicles, and the modernization of buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

In addition, the Southern California Association of Governments (SCAG) approved its 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained within baseline emissions inventory in the 2016 AQMP.⁹ The transportation strategy and transportation control measures (TCMs), included as part of the 2016 AQMP and State Implementation Plan (SIP) for the South Coast Air Basin (“Basin”), are based on SCAG’s 2016 RTP/SCS and Federal Transportation Improvement Program (FTIP). For purposes of assessing a project’s consistency with the AQMP, projects that are consistent with the growth forecast projections of employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP, since the growth projections contained in the RTP/SCS form the basis of the land use and transportation control portions of the AQMP. As discussed in Section XIV(a), Population and Housing, the Project includes the construction of a parking structure to serve existing office uses and would not induce any population or employment growth. As such, the project would not conflict with the regional employment growth projections for the Los Angeles Subregion. Thus, because the Project would not conflict with the growth projections and regional land use planning policies of the RTP/SCS, as detailed in Section XIV(a), Population and Housing, and Section VIII, Greenhouse Gas Emissions, the Project would not conflict with or obstruct implementation of the 2016 AQMP. Therefore, Project impacts would be less than significant without mitigation.

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

Less Than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to federal or State non-attainment pollutants. As the Basin is currently in non-attainment for ozone, PM₁₀ and PM_{2.5}, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of a project’s contribution of emissions, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project’s potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project specific impacts. Thus, a

⁹ *The 2016 AQMP is based on the 2016-2045 RTP/SCS. SCAG and CARB have since adopted a new 2020-2045 RTP/SCS, now called Connect SoCal in September 2020. The SCAQMD is currently working on a 2022 AQMP, which will base its analysis from Connect SoCal.*

project may result in a significant impact in cases where project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Accordingly, the following analysis quantifies the Project's construction and operational emissions to determine whether the project would exceed the SCAQMD's project based thresholds of significance.

Construction Emissions

For purposes of analyzing impacts associated with air quality, this analysis assumes a construction schedule of approximately 12 months, with a final buildout year in 2021. It should be noted that this construction analysis is based on a set of conservative assumptions to yield the maximum daily impacts. Construction activities associated with the Project would be undertaken in five main steps: (1) demolition; (2) grading and excavation; (3) building construction; (4) paving, and (5) architectural coatings and finishings. Construction activities would utilize heavy equipment and generate haul trips which would create emissions of dusts, fumes, equipment exhaust, and other air contaminants such as volatile organic compounds resulting from concrete curing, paint, and architectural coatings. Construction activities involving demolition and grading would primarily generate particulate matter (PM_{2.5} and PM₁₀) emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate carbon monoxide (CO) and nitrogen oxides (NO_x) emissions. The application of architectural coatings would primarily result in the release of Reactive Organic Gases (ROG) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

For purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Project's construction activities:

- Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
 - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 25 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent an excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.
- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- The Project shall comply with SCAQMD Rule 1113 limiting the volatile organic compound content of architectural coatings.

The Project's construction emissions were quantified utilizing the California Emissions Estimator Model (*CalEEMod Version 2016.3.2*) as recommended by the SCAQMD. Table 4.1, Estimated Peak Daily Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Project construction. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development.

As shown in Table 4.1, below, construction-related daily emissions associated with the Project would be below the peak daily regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, construction impacts are considered to be less than significant without mitigation.

Operational Emissions

The existing Project Site currently consists of a surface parking lot that serves an existing office building. Therefore, this analysis assumes there are no existing air quality emissions from the Project Site.

**Table 4.1
Estimated Peak Daily Construction Emissions**

Emission Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Demolition						
On-Site Fugitive Dust	--	--	--	--	1.29	0.19
On-Site Off-Road Diesel Equipment	2.13	20.95	14.66	0.02	1.15	1.08
Off-Site Hauling/Vendor/Worker Trips	0.26	0.04	0.48	<0.01	0.65	0.04
Total Emissions	2.39	20.99	15.14	0.03	3.09	1.31
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Grading/Excavation						
On-Site Fugitive Dust	--	--	--	--	1.93	0.99
On-Site Off-Road Diesel Equipment	1.35	15.08	6.45	0.01	0.68	0.62
Off-Site Hauling/Vendor/Worker Trips	0.61	19.62	4.56	0.06	1.56	0.48
Total Emissions	1.96	34.70	11.01	0.07	4.17	2.09
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Building Construction						
On-Site Off-Road Diesel Equipment	2.03	14.79	13.19	0.02	0.80	0.79
Off-Site Hauling/Vendor/Worker Trips	0.54	3.88	4.08	0.02	1.22	0.34
Total Emissions	2.57	18.67	17.27	0.04	2.02	1.13
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Paving						
Off-Road	0.77	7.74	8.85	0.01	0.41	0.38
Paving	0.00	0.00	0.00	0.00	0.00	0.00
Off-Site Hauling/Vendor/Worker Trips	0.06	0.04	0.44	<0.01	0.15	0.04
Total Emissions	0.83	7.78	9.29	<0.02	0.56	0.42
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
Architectural Coating						
On-Site Architectural Coating	3.75	0.00	0.00	0.00	0.00	0.00
On-Site Off-Road Diesel Equipment	0.21	1.53	1.81	<0.01	0.09	0.09
Off-Site Hauling/Vendor/Worker Trips	0.07	0.05	0.58	<0.01	0.19	0.05
Total Emissions	4.03	1.58	2.39	<0.02	0.28	0.14
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.</i>						

Operational emissions generated by an unenclosed parking structure would be limited to area source emissions that are generated by the re-application of paint, coatings and landscape maintenance. The parking structure is intended to serve an existing office building and would replace other existing surface parking; and thus, would not generate an increase in mobile source emissions.

The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod (Version 2016.3.2). The results of these calculations are presented in Table 4.2, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the Project would not exceed the daily regional thresholds of significance set by the SCAQMD. Therefore, impacts associated with regional operational emissions from the Project would be less than significant without mitigation.

**Table 4.2
Proposed Project Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area Sources	0.09	<0.01	0.08	<0.01	<0.01	<0.01
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	0.00	0.00	0.00	0.00	0.00	0.00
Total Project Emissions	0.09	<0.01	0.08	<0.01	<0.01	<0.01
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.09	<0.01	0.08	<0.01	<0.01	<0.01
Energy Sources	0.00	0.00	0.00	0.00	0.00	0.00
Mobile Sources	0.00	0.00	0.00	0.00	0.00	0.00
Total Project Emissions	0.09	<0.01	0.08	<0.01	<0.01	<0.01
SCAQMD Thresholds	55	55	550	150	150	55
Potentially Significant Impact?	No	No	No	No	No	No
<i>Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.</i>						

As discussed above, the Project would not generate construction or operational emissions that exceed the SCAQMD’s recommended regional thresholds of significance. As discussed within the Site Access and Circulation Evaluation (Appendix G to this IS/MND), trip generation is based on the size and type of land use included in a development and is independent from parking supply. Thus, the Project itself would not generate new trips or vehicle miles traveled (VMT). The parking structure is intended to serve an existing office building and would replace other existing surface

parking; and therefore, would not generate an increase in mobile source emissions. Mobile sources are already accounted for from current operations of the office building and existing surface parking. As noted, the Project is for the construction of new parking structure only, and does not involve any modification to the floor area of the existing AAA facilities that would lead to an increase in mobile source emissions. Therefore, the Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in non-attainment, and impacts would be less than significant without mitigation.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations that are more susceptible to the effects of air pollution than are the population at large. The SCAQMD identifies the following as sensitive receptors: long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, childcare centers, and athletic facilities.¹⁰

Localized Significance Thresholds

The SCAQMD has developed localized significance thresholds (LSTs) that are based on the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. These localized thresholds, which are found in the mass rate look-up tables in the “Final Localized Significance Threshold Methodology” document prepared by the SCAQMD,¹¹ apply to projects that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. 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 standards, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA). For PM₁₀, the LSTs were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM_{2.5}, the LSTs were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions.

LSTs are provided for each of SCAQMD’s 38 SRAs at various distances from the source of emissions. The Project Site is located within SRA 1, which covers the Central

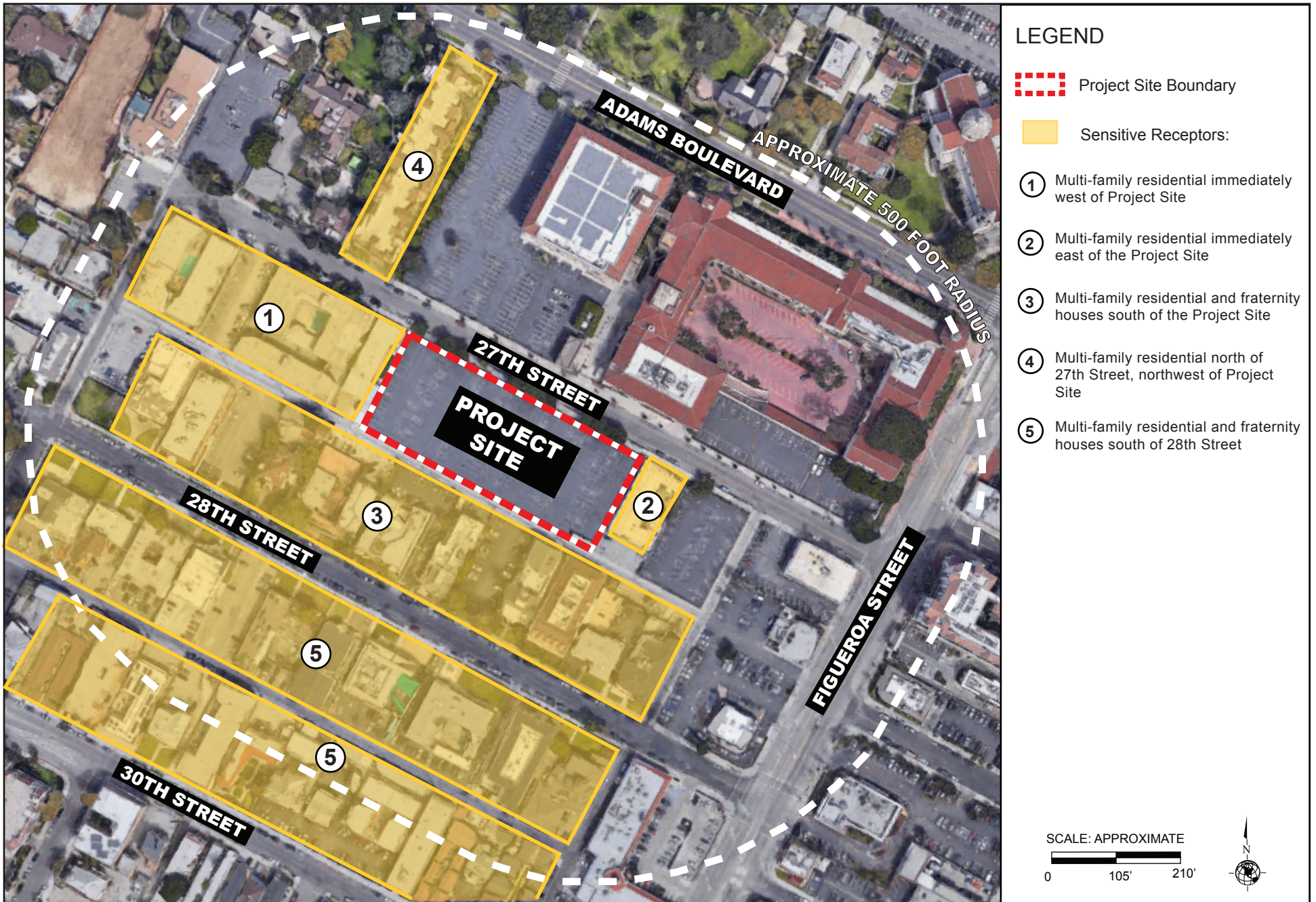
¹⁰ *South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993, page 5-1.*

¹¹ *South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, June 2003, Revised July 2008.*

Los Angeles County area. The mass rate look-up tables provide LSTs for one-acre, two-acre, and five-acre sites. Thresholds for a two-acre site are higher than a one-acre site. Since the Project Site is approximately 1.6 acres, the one-acre LSTs were conservatively applied for the Project. The nearest sensitive receptors that could potentially be subject to localized air quality impacts associated with construction of the Project are the multi-family residences that border the Project Site to the south, east and west, and to the northwest across W. 27th Street. Figure 4.1, below, shows the location of air quality sensitive receptors in relation to the Project Site. Given the proximity of these sensitive receptors to the Project Site, the LSTs for a one-acre site with receptors located within 25 meters was used to address the potential localized air quality impacts associated with the construction-related NO_x, CO, PM₁₀, and PM_{2.5} emissions for each construction phase.

Localized Construction Emissions

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. On-site localized emissions occur from combustion of construction equipment and PM₁₀ and PM_{2.5} emitted from construction site preparation activities. Localized emissions are calculated from the total on-site emissions during each phase of construction and does not include the off-site construction emissions from hauler, worker, or vendor trips. However, as shown in Table 4.3, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during construction activities for each phase would not exceed the applicable construction LSTs for an approximate one-acre site in SRA 1. These calculations assume that appropriate dust control measures would be implemented as part of the Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. Therefore, with implementation of the regulatory code compliance measures identified above, localized air quality impacts from construction activities on the off-site sensitive receptors would be less than significant without mitigation.



Source: Google Earth, Aerial View, 2019.

Localized Operation Emissions

With regard to localized emissions from motor vehicle travel, traffic congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The Basin is currently in attainment for CO emissions, and based on existing ambient CO levels within the Basin, the Project's mobile source emissions would not exceed the 1-hour or 8-hour CO hotspot concentration threshold for creating a significant impact. This finding is consistent with the AQMD's 2003 AQMP, which modeled localized CO emissions at the four highest traffic volume intersections within the Basin and found the localized emissions to be well below the thresholds of significance for both the 1-hour and 8-hour thresholds. The study intersections included:

**Table 4.3
Localized On-Site Peak Daily Construction Emissions**

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition	20.95	14.66	2.44	1.27
Grading/Excavation	15.08	6.45	2.61	1.61
Building Construction	14.79	13.19	0.80	0.79
Paving	7.74	8.85	0.41	0.38
Architectural Coatings	1.53	1.81	0.09	0.09
SCAQMD Localized Thresholds ^c	74	680	5	3
<i>Potentially Significant Impact?</i>	No	No	No	No

^a The localized thresholds for all phases are based on a receptor within a distance of 82 feet (25 meters) in SCAQMD's SRA 1 for a Project Site of one acre.

^b The localized thresholds listed for NO_x takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the SCAQMD's "Final Localized Significance Threshold Methodology" guidance document. The analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.

^c SCAQMD, Final LST Methodology Document, Appendix C – Mass Rate LST Look-Up Tables, October 21, 2009, and Sample Construction Scenarios for Projects Less than Five Acres in Size, Appendix K. The LST is for each individual construction phase and not the totality of the phases combined.

Source: CalEEMod 2016.3.2, Calculation sheets are provided in Appendix A to this IS/MND.

(a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; and (d) Long Beach Boulevard and Imperial Highway. The intersection of Wilshire Boulevard and Veteran Avenue, in west Los Angeles, was identified as the most congested intersection in Los Angeles County, with an average daily traffic volume of about 100,000 vehicles per day.¹² As reported in the 2016 AQMP, the highest concentrations of CO continued to

¹² South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

be recorded in the areas of Los Angeles County, where vehicular traffic is most dense, with the maximum 8-hour and 1-hour concentration (4.3 ppm and 3.0 ppm, respectively) recorded in the South Central Los Angeles County area. Thus, as the Basin is still in attainment for CO, and since ambient CO concentrations in the Basin remain lower than the highest recorded CO concentrations in 2003, it can be concluded that the Project would not result in a significant localized CO hotspot impact. The concentration of 750 parking spaces on site, even assuming all 750 vehicles were idling, would generate fewer emissions than the volume of traffic at the intersection of Wilshire Boulevard and Veteran Avenue during peak hours. Therefore, no further analysis for CO hotspots is warranted, and localized operational emissions would be less than significant without mitigation.

Toxic Air Contaminants (TAC)

Construction Emissions

The Project's construction activities would generate toxic air contaminants (TAC) in the form of diesel particulate matter (DPM) emissions associated with the use of heavy trucks and construction equipment during construction. DPM has no acute exposure factors (i.e., no short-term effects). Therefore, the SCAQMD Handbook does not recommend an analysis of TACs from short-term construction activities, which result in a limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. Given the short-term construction schedule of approximately 18 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (12 out of 840 months of a 70-year lifetime), health risks associated with DPM emissions during construction would be less than significant. Moreover, the Project would be required to comply with the California Air Resources Board (CARB) Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location. In addition, as discussed above, the Project would not result in a localized significant impact. Therefore, the Project would result in a less than significant impact related to construction TACs without mitigation.

Operational Emissions

The Project consists of the operation of a 4.5-story parking structure with 750 spaces. The parking structure would not support any land uses or activities that would involve the use, storage, or processing of carcinogenic or non-carcinogenic toxic air

contaminants. As such, no significant toxic airborne emissions would result from Project implementation. In addition, construction activities would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant without mitigation.

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

Less Than Significant Impact. A significant impact may occur if objectionable odors occur which would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds (VOC) from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, construction activities or materials would not create a significant source of objectionable odors. As the Project involves no elements related to the types of activities typically associated with objectionable odors, no odors from the proposed uses are anticipated. Therefore, potential operational odor impacts would be less than significant without mitigation.

Mitigation Measures

Project-level and construction-related impacts with regard to air quality would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects in the Project Site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City.

Cumulative development can affect the implementation of the 2016 AQMP. The 2016 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2016 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 by SCAG, implementation of the 2016 AQMP will not be obstructed by such growth, and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2016 AQMP would be less than significant without mitigation.

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Thus, as discussed in response to Checklist Question III (c) above, because the construction-related and operational daily emissions associated with the Project would not exceed the SCAQMD's recommended thresholds, these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant without mitigation.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, the proposed parking structure would not include any objectionable odors from long-term operations. Thus, cumulative odor impacts would be less than significant without mitigation.

IV. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulatory Setting

Federal Endangered Species Act

Under the Federal Endangered Species Act (FESA), the Secretary of the Interior and the Secretary of Commerce have joint authority to list a species as threatened or endangered (16 United States Code [USC] 1533[c]). Pursuant to the requirements of

the FESA, a federal agency reviewing a project within its jurisdiction must determine whether any federally listed, threatened, or endangered species, or species proposed for federal listing may be present in the project area and determine whether the project will have a potentially significant impact on such species. In addition, the federal agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the FESA or result in the destruction or adverse modification of critical habitat proposed to be designated for such species (16 USC 1536[3],[4]). Adverse project impacts on these species or their habitats would be considered potentially significant.

Migratory Bird Treaty Act (MBTA)

The federal Migratory Bird Treaty Act (16 USC, Sec.703, Supp. I, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs. The over 800 avian species, including geese, ducks, shorebirds, raptors, songbirds, and many relatively common species, protected under the MTBA are listed in 50 CFR 10.13.

California Endangered Species Act

Section 2080 of the California Fish and Game Code prohibits the taking of plants and animals listed under the authority of the California Endangered Species Act (CESA). Under the CESA, the CDFW maintains a list of threatened species and endangered species (California Fish and Game Code 2070). The CDFW also maintains a list of candidate species that are species that the CDFW has formally noticed as being under review for addition to either the list of endangered species or the list of threatened species. The CDFW also maintains lists of “species of special concern” which serve as “watch lists.” Pursuant to the requirements of the CESA, an agency reviewing a project within its jurisdiction must determine whether any state-listed endangered or threatened species may be present in the project area and determine whether a project will have a potentially significant impact on such species.

City of Los Angeles Protected Tree Ordinance

The City of Los Angeles Municipal Code (LAMC) (Section 1., Subdivision 12 of Subsection (a) of Section 12.21; Ordinance 177,404 as amended) provides for the protection of native trees of four types: (1) oaks other than scrub oak (*Quercus dumosa*), (2) Southern California black walnut (*Juglans californica var. californica*), (3) western sycamore (*Platanus racemosa*), and (4) California bay (*Umbellularia*

californica). To qualify for protection, individual plants must also measure four inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the tree. Pursuant to the requirements of the City of Los Angeles Urban Forestry Division, street trees would need to be replaced on a 2:1 basis. Removal of the existing street trees in the public right-of-way would occur in accordance with the policies of the City of Los Angeles Department of Public Works, Bureau of Street Services, Urban Forestry Division. Removal of the existing street tree in the public right-of-way would require approval of the Board of Public Works.

Project Impact Analysis

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less Than Significant Impact. A project would normally have a significant impact on biological resources if it has the potential to result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern under state or federal plans, policies or regulations; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.¹³

The Project Site is located in an urbanized area in the City, and the Project Site is improved with a paved surface parking lot and is devoid of any vegetation. The California Department of Fish and Wildlife or U.S. Fish and Wildlife Service IPaC Planning and Consultation interactive database identifies known or expected occurrences of species or critical habitat on or near a project area. Based on a review of the site conditions and the IPaC database, the Project Site does not contain any critical habitat or support any species identified as an endangered, threatened, rare, protected, candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (See USFWS IPaC Resource List in Appendix J). The Project Site is an asphalt-paved surface parking lot and is entirely devoid of any vegetation. Based on the

¹³ *City of Los Angeles, Los Angeles CEQA Thresholds Guide, 2006.*

Project Tree Report, dated February 7, 2020 (included as Appendix B to this IS/MND), there are no trees within the Project Site boundaries. However, there are 10 street trees (10 Carob *Ceratonia siliqua*) in the public right-of-way surrounding the Project Site along W. 27th Street that may be impacted by the proposed development. None of the street trees within the right-of-way are native or protected tree species, however any planned removal or impacts to street trees would require consultation with the Department of Public Works, Urban Forestry Division and approval by the City of Los Angeles Board of Public Works. The Project Tree Report concluded that of the 10 existing street trees, at least one tree would need to be removed as a result of project construction to facilitate the realignment of the driveway entrance. Construction and grading activities within the Project limits would not be expected to adversely impact the trees or tree root structures for the remaining nine street trees. However, as noted in the Project Tree Report, due to the extensive sidewalk damage and root conditions of the street trees on W. 27th Street, and the anticipated need to repair and replace the sidewalk in front of the Project Site, these trees may be condemned for removal to repour the sidewalk. This determination would be made in consultation with the Department of Urban Forestry, and any tree removals would be conditioned on tree replacement/replanting. Urban Forestry typically requires replacement of street trees at a 2:1 ratio. Thus, a permit would be required to address these removals. With approval from the Board of the Public Works and adherence to any associated permit conditions, the Project would have a less than significant impact upon removal of non-protected trees.

While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees would have the potential to impact nesting bird species if any nesting birds are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Sections 3503, 3503.5, and 3513 of the California Department of Fish and Game Code.¹⁴ To ensure compliance with the MBTA and California Department of Fish and Game Code, the City of Los Angeles Department of City Planning advises applicants to avoid tree removal activities during the breeding season. If avoidance is not feasible, the Department of City Planning recommends weekly bird surveys be conducted to ensure that the trees proposed for removal are not occupied by nesting birds. For

¹⁴ Sections 3503, 3503.5, and 3513 of the California Fish and Game Code make it unlawful to “take, possess, or needlessly destroy” the nest or eggs of any bird (Section 3503), any bird-of-prey (Section 3503.5), or any migratory nongame bird as designated in the Migratory Bird Treaty Act (Section 3513).

purposes of this analysis, the following regulatory compliance measures have been identified as being applicable to the Project's construction activities:

- Habitat Modification (Nesting Native Birds): Proposed project activities (including disturbances to native and non-native vegetation, structures and substrates) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).
- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall:
 - Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors) as access to adjacent areas allows. The surveys shall be conducted by a Qualified Biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
 - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species (within 500 feet for suitable raptor nesting habitat) until August 31.
 - Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
 - The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the project.
 - The Project shall comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, which make it unlawful to "take, possess, or needlessly destroy" the nest or eggs of any bird (Section 3503), any

bird-of-prey (Section 3503.5), or any migratory nongame bird as designated in the Migratory Bird Treaty Act (Section 3513).

Thus, adherence to regulatory compliances measures, detailed above, would ensure that the Project would have a less than significant impact on sensitive biological species or habitat.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A project would normally have a significant impact on biological resources if it could result in: (a) the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; (c) the alternation of an existing wetland habitat; or (d) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.¹⁵ The Project Site is currently occupied by a surface parking lot. No riparian or other sensitive natural community is located on or adjacent to the Project Site (see USFWS IPaC Resource List in Appendix J). Therefore, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A project would normally have a significant impact on biological resources if it could result in the alteration of an existing wetland habitat. The Project Site is entirely developed and covered with impermeable surfaces and does not contain any wetlands or natural drainage channels. Therefore, the Project Site does not have the potential to support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act (See Section 4(b), above) and no impacts to riparian or wetland habitats would occur with implementation of the Project.

¹⁵ *City of Los Angeles, Los Angeles CEQA Thresholds Guide, 2006.*

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. A project would normally have a significant impact on biological resources if it could result in the interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is currently improved with a surface parking lot. No vegetation is located within the parking lot. Due to the highly urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. Therefore, the Project would not interfere with the movement of any resident or migratory fish or wildlife species or wildlife corridors or impede native wildlife nursery sites, and no impact would occur with respect to the Project.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. A project-related significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance, 177,404. There are 10 street trees located adjacent to the Project Site, at least one tree would be removed during construction and operation of the Project, which would be determined during construction. None of the trees are protected native tree species.¹⁶ As such, no protected trees would be removed. Therefore, the Project would not have the potential to conflict with the City of Los Angeles Protected Tree Ordinance. Thus, any impacts upon the loss of on-site trees and street trees would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. A significant impact would occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan. Therefore, no impact would occur with implementation of the Project.

¹⁶ *The Urban Lumberjack, Tree Report, 640-700 West 27th Street, Los Angeles, CA 90007, February 2, 2020.*

Mitigation Measures

Project impacts with regard to biological resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The Project would have no impact upon biological resources. Development of the Project in combination with related projects would not significantly impact wildlife corridors or habitat for any endangered, threatened, rare, protected, candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFW or the USFWS as no such habitat occurs in the vicinity of the Project Site due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance, Federal Migratory Bird Treaty Act, Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, and any other mitigation measures or regulatory compliance measures applicable to each project site. Thus, cumulative impacts to biological resources would be considered less than significant without mitigation.

V. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification, and in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the

identification, documentation, and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended, and the California Register of Historical Resources (California Register) are the primary federal and state laws and regulations governing the evaluation and significance of historic resources of national, state, regional, and local importance. As archaeological resources are also considered historic, regulations applicable to historic resources are also applicable to archaeological resources and are discussed and analyzed in this section. As described below, the principal federal, state, and local laws governing and influencing the preservation of historic resources of national, state, regional, and local significance include the NHPA of 1966, as amended; the California Register; California Environmental Quality Act (CEQA); and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.120 et seq.), and the City of Los Angeles General Plan Conservation Element, all of which are summarized below.

National Register of Historic Places

The National Register of Historic Places (National Register) was established by the NHPA, as “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.”¹⁷ The National Register recognizes properties that are significant at the national, state, and/or local levels.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change to a historical resource also has a significant effect on the environment pursuant to the State CEQA Guidelines. When the California Register was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”¹⁸

¹⁷ Title 36 Code of Federal Regulations (CFR) Part 60.2.

¹⁸ State CEQA Guidelines Section 15064.5(b)(1).

California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁹ The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.

City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (HCM). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture.

Los Angeles General Plan Conservation Element

The City's guidelines for the protection of historic and cultural resources are contained in Section 5. The Conservation Element establishes the policy to continue to protect pre-historic, historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.

Project Impact Analysis

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. A significant impact may occur if the Project would result in a substantial adverse change in the significance of a historic resource. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local

¹⁹ *Public Resources Code Section 5024.1(a).*

register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.²⁰

The Project Site is currently developed with an asphalt-paved surface parking lot. The Project involves site clearing and demolition of the surface parking lot for the construction of a new 4.5-story parking structure. Because there are no buildings on the Project Site, there are no historic resources on the Project Site that would be listed on the National Register, California Register, or local listing.^{21,22}

There are two historic buildings within close proximity of the Project Site: the AAA Headquarters Building, located at 2601 S. Figueroa Street, approximately 70 feet north of the Project Site; and the Shankland House, located at 715 W. 28th Street, approximately 80 feet southwest of the Project Site. Both buildings are designated as a Los Angeles Historic-Cultural Monument.²³ Additionally, there are two potentially historic buildings, located to the south/southeast of the Project Site: a residential building located at 633 W. 28th Street and a residential building located 639 W. 28th Street.²⁴ Further, the University Park Historic Preservation Overlay Zone (HPOZ), is located north of Adams Boulevard, approximately 1,000 feet north of the Project Site.

The Project would have no direct impacts on these two historic buildings, two potentially historic buildings, and the HPOZ. There are no historical resources on the Project Site, and no historical resources would be demolished, destroyed, altered, or relocated as a result of the Project. The historic resources identified would remain intact, would

²⁰ CEQA Guidelines, Section 15064.5(b)(1).
²¹ City of Los Angeles, Bureau of Engineering, Navigate LA, website: <http://navigatela.lacity.org/navigatela/>, accessed December 2019.
²² City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, website: <http://historicplacesla.org/map>, accessed December 2019.
²³ City of Los Angeles, Historic Places LA, Los Angeles Historic Resources Inventory, website: <http://historicplacesla.org>, accessed December 2019.
²⁴ City of Los Angeles, Los Angeles Historic Resources Survey, SurveyLA, South Los Angeles, Individual Resources, March 2012, website: <https://preservation.lacity.org/files/SLAAppendixAFinal3-12.pdf>, accessed December 2019.

continue to retain their character-defining features and their original designs. The Project would have a less than significant impact on these historical resources near the Project Site as the Project does not directly abut these properties. The Project would have no direct impacts such as demolishing, destroying, or altering of these historic resources, and thus, would not result in a substantial adverse change to the immediate surroundings of this historical resource to the degree it would no longer be eligible for listing under national, state, or local landmark designation programs. No mitigation is required or recommended. Therefore, the development of the Project would have a less than significant impact to surrounding historical resources without mitigation.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Project would disturb archaeological resources, which presently exist within the portion of the Project Site proposed to be developed, which has been previously graded and developed.

The Project Site and immediate surrounding areas do not contain any known archaeological resources.²⁵ To determine whether any known archaeological resources exist in proximity to the Project Site, a records search was conducted with the South Central Coastal Information Center (SCCIC). The SCCIC record search (dated March 13, 2020) is contained in Appendix I to this IS/MND. The SCCIC records search did not identify any known archaeological resources on the Project Site or within a ½-mile radius of the Project Site. It is important to note that the absence of any archaeological records does not necessarily mean that no resources are present. It may simply mean that the area has not been studied and/or that no information regarding the archaeological sensitivity of the property has been filed at this office. The reported records search result does not preclude the possibility that surface or buried artifacts might be found during a survey of the property or ground-disturbing activities. Additionally, the natural ground-surface appears to be obscured by black-top pavement; consequently, archaeological surface finds would be highly unlikely. However, buried prehistoric or historic cultural resources may be present. Therefore, in order to assess archaeological sensitivity, the SCCIC recommends an archaeological monitor should be retained to monitor ground-disturbing activities as the existing pavement is removed and the ground is prepared for the new parking structure.

²⁵ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric & Historical Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

As noted in the Geotechnical Investigation (see Appendix C to this IS/MND), undocumented artificial fill exists within the upper few feet at the site and may have been associated with original grading operations to construct the parking lot. Thus, prior earthwork activities and the lack of any prior records of archaeological resources indicates low potential to encounter archaeological resources during construction.

Because the presence or absence of such materials cannot be determined until the portion of the Project Site proposed to be developed is graded, the Department of City Planning requires adherence to regulatory compliance measures for proper handling of any archaeological resources discovered during construction. If archaeological resources are discovered during surface grading or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find and treated it in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site proposed to be developed. Adherence to regulatory compliance measures would ensure that if any archaeological resources are encountered during construction, impacts to such resources would remain less than significant. Therefore, the development of the Project would have a less than significant impact to archaeological resources without mitigation.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. A project-related significant adverse effect could occur if grading activities associated with the Project would disturb previously interred human remains. No known human burials have been identified on the Project Site or its vicinity. However, it is possible that unknown human remains could occur, and if proper care is not taken during construction, damage to or destruction of these unknown remains could occur. If human remains are encountered unexpectedly during construction surface grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. Compliance with regulatory compliance measures would ensure any potential impacts related to the disturbance of unknown human remains and archaeological resources would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to cultural resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Implementation of the Project, in combination with the related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project’s impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following compliance with regulatory measures. Therefore, the Project’s incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

VI. Energy

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Corporate Average Fuel Economy (CAFE) Standards

Enacted by Congress in 1975, the Corporate Average Fuel Economy (CAFE) standard’s purpose is to reduce energy consumption by increasing the fuel economy of cars and light trucks. The CAFE standards are fleet-wide averages that must be achieved by each automaker for its car and truck fleet, each year, since 1978. When these standards are raised, automakers respond by creating a more fuel-efficient fleet. CAFE

standards are regulated by the United States Department of Transportation's (U.S. DOT) National Highway Traffic Safety Administration (NHTSA). The NHTSA sets standards to increase CAFE levels rapidly over the next several years, which will improve the nation's energy security and save consumer's money at the gas pump, while also reducing greenhouse gas (GHG) emissions. In 2012, the NHTSA established final passenger car and light truck CAFE standards for model years 2017 through 2021, which the agency projects will require in model year 2021, on average, a combined fleet-wide fuel economy of 40.3 to 41.0 miles per gallons (mpg). Currently, the U.S. DOT and the U.S. Environmental Protection Agency (U.S. EPA) propose the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which would amend existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026. The NHTSA and the U.S. EPA are currently seeking comment on this proposal.^{26,27}

Fuel efficiency standards for medium- and heavy-duty trucks have been jointly developed by U.S. EPA and NHTSA. The Phase 1 medium- and heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018, and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type.²⁸ U.S. EPA and NHTSA have also adopted the Phase 2 medium- and heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type.²⁹

California Global Warming Solutions Act (AB 32)

As discussed in Section VIII, Greenhouse Gas Emissions, of this IS/MND, Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the state to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32

²⁶ U.S. DOT, *Corporate Average Fuel Economy (CAFE) Standards*, accessed August 2020.

²⁷ U.S. DOT, NHTSA, *Corporate Average Fuel Economy (CAFE), Laws and Regulations*, accessed August 2020.

²⁸ U.S. EPA, NHTSA, *Federal Register Volume 76, No. 179, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles*, September 15, 2011.

²⁹ U.S. EPA, NHTSA, *Federal Register Volume 81, No. 206, Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles – Phase 2*, October 25, 2016.

tasked the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) with providing information, analysis, and recommendations to CARB regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. On July 2018, CARB announced that greenhouse gas pollution in California fell below 1990 levels, therefore achieving its 2020 greenhouse gas emissions goal set by AB 32.³⁰

California Renewables Portfolio Standard

The California Renewables Portfolio Standard (RPS) program, which was established in 2002 by Senate Bill (SB) 1078, required that 20 percent of the available energy supplies in California come from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20-percent mandate to 2010. These mandates apply directly to investor-owned utilities. In 2011, California Governor Jerry Brown signed into law Senate Bill 2X, which modified California’s RPS program to require that both publicly- and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. In October 2015, Governor Brown signed into legislation Senate Bill 350 (SB 350), which requires retail sellers and publicly-owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030. In 2018, Senate Bill 100 (SB 100) was signed into law, which again increases the RPS to 60 percent by 2030 and requires all of California’s electricity to come from carbon-free resources by 2045. SB 100 became effective on January 1, 2019.³¹

Title 24 Energy Efficiency Standards

California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations) (“Title 24 Standards”) were established in 1978 in response to a legislative mandate to reduce California’s energy consumption to ensure that building construction and system design and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The standards are updated periodically (typically every three years) to allow consideration and possible incorporation of new energy efficiency technologies and methods.

³⁰ CARB, “Climate Pollutants Fall Below 1990 Levels for First Time”, accessed May 2019.

³¹ California Public Utilities Commission, California Renewables Portfolio Standard, accessed July 2019.

The 2019 Standards went into effect on January 1, 2020, and improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 update to the Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of new constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Standards include the introduction of photovoltaic into the prescriptive package, improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential Standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2017 national standards. The 2019 Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. Furthermore, the 2019 update requires that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.³²

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”³³ The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. As previously mentioned, the 2019 update to the CALGreen Code went into effect on January 1, 2020. The 2019 CALGreen Code improves upon the previously applicable 2016 CALGreen Code by updating standards for bicycle parking, electric vehicle charging, and water efficiency and conservation.

³² California Energy Commission, *2019 Building Energy Efficiency Standards, December 2018*, https://ww2.energy.ca.gov/publications/displayOneReport_cms.php?pubNum=CEC-400-2018-020-CMF

³³ California Building Standards Commission, *2010 California Green Building Standards Code, (2010)*.

The Green New Deal Sustainable City pLAN 2019

In 2015, Mayor Eric Garcetti released the City's first Sustainable City pLAN (Sustainable City pLAN) through Executive Directive No. 7. In 2019, the Mayor's office adopted The Green New Deal Sustainable City pLAN 2019 (L.A.'s Green New Deal) as an update to the 2015 Sustainable City pLAN. L.A.'s Green New Deal establishes accelerated goals for a cleaner environment and a stronger economy, with commitment to equity as its foundation.

City of Los Angeles Green Building Code

In 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the "LA Green Building Code." Ordinance No. 184,692 amended certain provisions of LAMC Chapter IX, Article 9 to reflect local administrative changes and incorporated by reference portions of the 2016 CALGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the LA Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. Chapter IX, Article 9, Division 5 includes mandatory measures for newly constructed non-residential and high-rise residential buildings. The LA Green Building Code includes some requirements that are more stringent than State requirements such as increased requirements for electric vehicle charging spaces and water efficiency, which results in potentially greater energy demand reductions from improved transportation fuel efficiency and water efficiency. Specific measures in the LA Green Building Code intended to improve building energy efficiency and conserve energy are included as LAMC Sections 99.04.201 through 99.04.505 for residential mandatory measures and as LAMC Sections 99.05.201 through 99.05.504 for non-residential mandatory measures. These energy efficiency measures include renewable energy, indoor and outdoor water uses, water reuse systems, waste reduction, pollutant control, and interior moisture control measures.

2017 Final Power Strategic Long-Term Resource Plan (SLTRP)

In April 2018, the Los Angeles Department of Water and Power (LADWP) approved the Power Strategic Long-Term Resource Plan (SLTRP), which increases LADWP's planning horizon, by 20 years from 2037 to 2050, in order to better align with Statewide GHG emissions goals and align with Los Angeles' 100 percent clean energy initiative, detailed in the City's Los Angeles Green New Deal. In 2018, the SLTRP will extend

through 2050 while a separate, streamlined IRP document will be produced for submission and filing with the California Energy Commission in accordance to the Senate Bill 350. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and power system assets that meets the City’s future energy needs at the lowest cost and risk consistent with LADWP’s environmental priorities and reliability standards.

The 2017 Power SLTRP outlines an aggressive strategy for LADWP to accomplish its goals, comply with regulatory mandates under the State’s RPS regulations, and provide sufficient resources over the next 20 years. The 2017 Power SLTRP incorporates the Enforcement Procedures for the RPS for Local Publicly Owned Electric Utilities pursuant to Section 399.30(l) of the California Renewable Energy Resources Act (SB 2 [1X]) and identifies optional compliance measures found in the Regulations. The 2017 Power SLTRP identifies a combination of GHG reduction strategies, including early coal replacement two years ahead of schedule by 2025; accelerating LADWP’s RPS to 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036; doubling of energy efficiency from 2017 through 2027; repowering coastal in-basin generating units with new, highly efficient potential clean energy projects by 2029 to provide grid reliability and critical ramping capability; accelerating electric transportation to absorb GHG emissions from the transportation sector; and investing in the Power System Reliability Program to maintain a robust and reliable power system. Thus, the 2017 Power SLTRP would achieve and exceed mandates established in previous RPS. In order to achieve a 100 percent clean energy portfolio, these strategies listed in the 2017 Power SLTRP are provided for LADWP to incorporate in order to reach the City’s overall 100 percent clean energy initiative, as part of the City’s Green New Deal.

With respect to the status of LADWP’s RPS portfolio, the LADWP increased its renewable energy percentage from 3 percent in 2003 to 25 percent in 2010.³⁴ LADWP exceeded the second SB2-1X compliance period of 2014 through 2016, which required the sum of 20 percent RPS for 2014, 21 percent RPS for 2015, and 29 percent RPS for 2016.³⁵ The 2016 Final Power Integrated Resource Plan, which preceded the 2017 Power SLTRP, identifies strategies to achieve a RPS of 50 percent by 2030 with interim targets of 40 percent by 2024 and 45 percent by 2027.³⁶

³⁴ LADWP, *2017 Final Power Strategic Long-Term Resources Plan (SLTRP)*, December 2017.

³⁵ *SB 2X-1X SBX1-2 was signed by Governor Edmund G. Brown, Jr., in April 2011 to codify the ambitious 33 percent by 2020 goal.*

³⁶ LADWP, *2016 Final Power Integrated Resource Plan*, December 2016.

Project Impact Analysis

- a) **Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less Than Significant Impact. A significant impact would occur if the Project results in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The Project would replace an existing surface parking lot with an above-grade parking structure. The Project is required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. California's Energy Efficiency Standards located at Title 24, Part 6, Sections 120.0 to 120.9 and 130.0 to 141.0 of the California Code of Regulations and commonly referred to as "Title 24," which was established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California's Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2019 Standards will continue to improve upon the 2016 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2019 Standards became effective on January 1, 2020.³⁷ The Energy Efficiency Standards are a specific response to the mandates of AB 32, (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The Project includes energy efficiency components to conserve energy, which are detailed below.

Construction

Energy would be consumed during the construction phases of the Project for grading and heavy-duty equipment use, which is usually diesel powered. Construction of the Project would generate an increased demand for electricity use related to the treatment and conveyance of water for dust suppression activities during the demolition and grading phases, the use of an on-site portable construction office trailer, and the consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and

³⁷ *California Energy Commission, 2019 Building Energy Efficiency Standards, website: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency>, accessed May 2020.*

worker commute trips. Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. As summarized in Table 4.4, Construction Energy Use, below, the estimated energy use during construction of the Project would include 8,375 kWh of electricity, 8,325 gallons of gasoline, and approximately 30,719 gallons of diesel fuel.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. Further, compliance with regulatory compliance measures, such as restricting haul trucks to off-peak hours and not allowing engines to idle excessively when not in use (AQMD Rule 403), and meeting specified fuel and fuel additive requirements and emission standards (C.C.R. Title 13, Sec. 2485), would further serve to increase energy efficiency and reduce consumption of fossil fuels. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Accordingly, energy demands during construction would be less than significant.

**Table 4.4
Construction Energy Use**

Fuel Type	Quantity
Electricity	
Water Use	1,880 kWh
Temporary Office Trailer	6,495 kWh
Subtotal Electricity	8,375 kWh
Gasoline	
On-Road Vehicles (Workers Trips)	8,325 gallons
Diesel	
On Road Construction Equipment (Hauling/Vendors/Deliveries)	15,087 gallons
Off-Road Construction Equipment	15,632 gallons
Subtotal Diesel	30,719 gallons
<i>Notes:</i>	
<i>Source: Parker Environmental Consultants, 2020; Calculations provided in Appendix H, Energy Conservation Worksheets, to this Draft EIR.</i>	

Operation

Electricity

During operation of the Project, a minimal amount of energy would be required to operate the 4.5 level parking structure. Electricity would be required for lighting,

operation of the elevator, and installation of Electric Vehicle Charging Stations. As the proposed parking structure is above grade and open air, the structure would be naturally ventilated and would not require the use of any venting or exhaust fans. The energy demand for the Project was calculated using the CalEEMod emissions model and is provided in Appendix H to this IS/MND. As shown in Table 4.5, below, the Project would result in a net energy demand of approximately 392,268 kWh of electricity per year. Implementation of code compliance measures would ensure the Project meets the minimum Title 24 energy efficiency requirements and further reduce demand for electricity, including peak power demands. Specifically, the Project would include energy efficient lighting fixtures. Additionally, LADWP would confirm the availability of electric service connections for the Project. Therefore, the development of the Project would not cause wasteful, inefficient or unnecessary consumption of electricity.

**Table 4.5
Operational Energy Use**

Land Use	Electricity Use (kWh)/year
Electricity	
Unenclosed Parking with Elevator	392,268 kWh
<i>Notes: Source: Parker Environmental Consultants, 2020; Calculations provided in Appendix D, Energy Conservation Worksheets, to this Draft EIR.</i>	

Natural Gas

The Project would not generate a demand for natural gas. As such, no further analysis is warranted.

Fossil Fuels

The Project is a 750 space parking structure that will serve an existing office land use. As such, the vehicle trips and associated fuel use generated by the vehicles that would utilize the parking structure already occur under the existing conditions. Thus, the operation parking structure would not generate any new trips. As such, the Project would not generate any additional fuel demands beyond the existing baseline conditions. As such, no further analysis is warranted.

As discussed in the preceding paragraphs, the Project would not result in wasteful, inefficient or unnecessary consumption of electricity, natural gas, or transportation

energy during construction and operation. Therefore, impacts to energy resources would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. A significant impact could occur if the Project has the potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency. With respect to renewable energy, all of the Project’s energy demands will be served by the City of Los Angeles Department of Water and Power (LADWP). Starting in 2017, the City’s Power Integrated Resource Plan (IRP) was expanded into the Power Strategic Long-Term Resource Plan (SLTRP), which will increase the planning horizon, from 20 years, ending in 2037, through 2050, in order to better align with Statewide greenhouse gas emissions (GHG) goals and align with Los Angeles’ 100% clean energy initiative. The LADWP’s 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides the LADWP Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The goal of the 2017 SLTRP is to identify a portfolio of generation resources and Power System assets that meets the City’s future energy needs at the lowest cost and risk consistent with LADWP’s environmental priorities and reliability standards. The 2017 SLTRP re-examines and expands its analysis on the 2016 IRP resource cases with updates in line with the latest regulatory framework, and updates to case scenario assumptions that include a 65 percent Renewable Portfolio Standard (RPS), advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification. As the Project would derive its electricity from the LADWP, the Project’s energy demands will primarily be derived from renewable energy sources.

With respect to energy efficiency, the Project would be required to comply with the *L.A. Green Building Code*. The *L.A. Green Building Code*, effective January 1, 2020, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The *L.A. Green Building Code* contains both mandatory and voluntary green building measures to conserve energy. Among many requirements, the Project will comply with the *L.A. Green Building Code* requirement that projects comply with the following requirements related to water efficiency and electric vehicle supply equipment:

Water Conservation. As mandated by the *L.A. Green Building Code*, the Project would also be required to develop a water budget for landscape irrigation use

and install automatic irrigation systems with weather or soil moisture-based controllers.

Electric Vehicle Supply Equipment. The Project would provide electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE) and the required number of EV charging stations. The incorporation of EVSE into the Project is consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips generated by the Project.

On a project specific level, the Project includes the following features which will further reduce energy demands:

In-Fill Smart Growth. The Project is located on an existing infill site that is currently developed with a surface parking lot, which is located in a highly developed area of South Los Angeles. The Project Site is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

Trip Reduction. In addition to its location in a Transit Priority Area (TPA), the Project would also provide on-site bicycle parking in bicycle storage spaces. The Project would provide 35 short-term bicycle parking spaces and 35 long-term bicycle parking spaces, for a total of 70 bicycle parking spaces. By accommodating bicycle spaces on-site, the Project would promote alternative modes of transportation which would serve to reduce regional VMT.

With incorporation of the features identified above, the Project would not cause wasteful, inefficient, or unnecessary consumption of energy and thus would not result in any significant environmental effects with respect to energy use. As such, the Project would not conflict with any adopted energy conservation plans, and impacts would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to energy would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with related projects within the City would further increase demand for electricity, natural, and fossil

fuels.

Electricity

The Project and related projects would further increase demand for electricity service provided by LADWP. As discussed above, the LADWP's 2017 SLTRP document serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. Based on the projections and strategies within the 2017 SLTRP, energy efficiency and solar savings are expected to increase in the future and significantly reduce electricity demands. Therefore, LADWP anticipates that it can meet the future demands of cumulative growth within its service area with implementation of regulatory and reliability initiatives and strategic initiatives. LADWP will continue to pursue and implement energy efficiency programs per SB 350, which has an adopted goal of achieving 50 percent renewable energy sources by 2030. Furthermore, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant with mitigation.

Natural Gas

Development of the Project would not generate any demands for natural gas resources. As such, the Project would not contribute to a cumulative impact to natural gas resources. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Fossil Fuels

The related projects would cumulatively increase the demand for transportation energy. Since the Project would not increase VMT in the local area, the Project's transportation impacts on transportation fuel would not be cumulative considerable. Nevertheless, the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and CARB have implemented several policies, rules, and regulations to improve vehicle efficiency, increase the use of alternative fuels, and decrease the reliance on fossil fuels. It is anticipated that the future Project-related and related projects' vehicle trips are expected to comply with CAFE standards and CARB's Advanced Clean Cars

Program, which would ultimately reduce non-renewable transportation fuel consumption. Additionally, a majority of the related projects are located within a TPA, which is defined as being within ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less. Therefore, the related projects’ locations would promote other modes of transportation such as walking, biking, and public transit options. As such, the Project and future related projects would be expected to cumulatively reduce consumption in transportation energy, and therefore be less than significant without mitigation.

VII. Geology and Soils

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 - ii. Strong seismic ground shaking?

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 - iii. Seismic-related ground failure, including liquefaction?

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------
 - iv. Landslides?

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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- b. Result in substantial soil erosion or the loss of topsoil?

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	-------------------------------------	--------------------------
- c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following section summarizes and incorporates by reference information from the Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, prepared by Advanced Geotechnical Solutions, Inc., dated March 10, 2020 (“Geotechnical Investigation”) and LADBS’ Geology and Soils Report Approval Letter, dated July 23, 2020. The Geotechnical Investigation and the Geology and Soils Report Approval Letter are included as Appendix C to this IS/MND.

Regulatory Setting

Alquist-Priolo Earthquake Fault Zoning Act

California’s Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code § 2621 et seq.), originally enacted in 1972 as the Alquist-Priolo Special Studies Zone Act and renamed in 1994, is intended to reduce the risk of life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (Earthquake Fault Zone). It also defines criteria for identifying active faults, giving legal weight to terms such as “active,” and establishes a process for reviewing building proposals in and adjacent to Earthquake Fault Zones. Under the Alquist-Priolo Act, fault zones are defined, and construction along or across them is strictly regulated if they are “sufficiently active” and “well-defined.” A fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined for the purposes of the Act as within the last 11,000 years). A fault is considered well-defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code [PRC] Sections 2690-2699.6) is intended to reduce the damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act; the State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards; and cities and counties are required to regulate development within mapped Seismic Hazard Zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic or geotechnical investigations have been carried out, and measures to reduce potential damage have been incorporated into the development plans.

California Building Standards Code

The State of California's minimum standards for structural design and construction are provided in the California Building Standards Code (CBSC) (California Code of Regulations Title 24). The CBSC is based on the International Building Code (IBC), which was developed by the International Code Council (ICC) and first published in 1997. The IBC is used widely throughout the United States (generally adopted on a state-by-state or district-by-district basis) and has been modified for California conditions with numerous, more detailed or more stringent regulations. The CBSC requires that "classification of the soil at each building site will be determined when required by the building official" and that "the classification will be based on observation and any necessary test of the materials disclosed by borings or excavations." In addition, the CBSC states that "the soil classification and design-bearing capacity will be shown in the building plans, unless the foundation conforms to specified requirements." The CBSC provides standards for various aspects of construction, including but not limited to: excavation, grading, and earthwork construction; fills and embankments; expansive soils; foundation investigations; and liquefaction potential and soil strength loss. The 2019 edition of the CBSC, which became effective on January 1, 2020 incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. In

accordance with California law, the proposed Project would be required to comply with all provisions of the CBSC.

City of Los Angeles General Plan Safety Element

The City’s Safety Element provides a contextual framework for understanding the relationship between hazard mitigation, response to a natural disaster, and initial recovery from a natural disaster. The Safety Element outlines the historic evolution in Los Angeles of local, state, and federal roles, particularly relative to mitigation of and response to natural disasters.

The Safety Element emphasizes seismic safety issues because seismic events present the most widespread threat of devastation to life and property. The City adopted a series of ordinances, which required retrofitting of certain existing structures and for new construction, as well as for the evaluation of structures by a structural engineer during the construction process. The Northridge earthquake underscored the need for thorough, on-going building inspections to assure construction of buildings according to City of Los Angeles Building Code.

PRC Code Section 2699 requires that a safety element “take into account” available seismic hazard maps prepared by the State Geologist pursuant to the Alquist-Priolo Earthquake Fault Zoning Act of 1972, subsequently amended (PRC Sections 2621-2630, originally known as the Alquist-Priolo Special Studies Zones Act) and the Seismic Hazard Mapping Act of 1990, subsequently amended (PRC Sections 2690-2699.6 and 3720-3725). The Hazard Mapping Act requires the State Geologist to map areas subject to amplified ground shaking (or conditions which have potential for amplified ground shaking), liquefaction, and landslide hazard areas.

Los Angeles Building Code

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in Los Angeles Municipal Code (LAMC), Chapter IX, Article 1. Specifically, Section 91.7006.7 includes requirements regarding import and export of material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Additionally, Section 91.1803 includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and

reports, soil and rock testing, and groundwater. As noted above, the Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The Los Angeles Department of Building and Safety (LADBS) is responsible for implementing the provisions of the Los Angeles Building Code.

Paleontological Resources

PRC Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for the unlawful damage or removal of paleontological resources. State regulations mandate protection of paleontological resources on public lands, and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain state regulations for historical resources.

Project Impact Analysis

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. A significant impact may occur if a project site is located within a State-designated Alquist-Priolo Zone or other designated fault zone. The Geotechnical Investigation concluded the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and faulting has not been mapped at the Project Site. The potential for fault rupture is considered low.

The major active faults in the region are the Puente Hills blind thrust fault (1.9 miles to the southwest), Elysian Park (4.1 miles to the northeast), the Newport-Inglewood Structural zone (5 miles to the west-southwest), and the Hollywood Fault north of the Project Site. No faults have been mapped on the Project Site.³⁸ The Project Site is located in the tectonically active Southern California area, and will therefore likely experience shaking effects from earthquakes. The type and severity of seismic hazards affecting the Project Site are to a large degree dependent upon the distance to the

³⁸ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, Page 4, March 10, 2020.*

causative fault, the intensity of the seismic event, the direction of propagation of the seismic wave and the underlying soil characteristics. The seismic hazard may be primary, such as surface rupture and/or ground shaking, or secondary, such as liquefaction, seismically induced slope failure or dynamic settlement. The Geotechnical Investigation identifies potential seismic hazards and proposed mitigations, if necessary, to reduce the hazard to an acceptable level of risk. The Geotechnical Investigation recommendations are guided by the California Building Code (2019), CDMG (2008), and Martin and Lew (1998).

Based on these considerations, the Project is considered feasible from a geotechnical standpoint, provided that the conclusions and recommendations presented in the Geotechnical Investigation are incorporated in the design and construction of the Project is to the satisfaction of the Department of Building and Safety. Sign off from the Department of Building and Safety would ensure that the Project meets the applicable performance measures described in the Geotechnical Investigation and as amended by the LADBS Approval Letter, dated July 23, 2020, which include but not limited to: foundation design, moisture and vapor barrier, retaining wall design, concrete design, corrosion, site drainage, exterior flatwork, and pavement design.³⁹ Accordingly, with the design and construction of the Project in conformance with the 2019 California Building Code seismic standards and approval by the Department of Building and Safety, impacts associated with seismic hazards would be less than significant. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Thus, Project impacts would be less than significant without mitigation.

ii) Strong seismic ground shaking?

Less Than Significant Impact. A significant impact may occur if a project represents an increased risk to public safety or destruction of property by exacerbating existing hazardous environmental conditions by exposing people, property, or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with other locations in Southern California. As discussed above, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone and was concluded to have a low potential for surface rupture beneath the Project Site. However, the nearest earthquake fault, the Puente Hills blind thrust fault is located 1.9 miles to the southwest. Therefore, the Project Site is located in the seismically active Southern California region

³⁹ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, Page 11-18, March 10, 2020.*

and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. However, this hazard is common in Southern California and the effects of ground shaking can be mitigated if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The Geotechnical Investigation concluded that the construction of the Project is considered feasible from a geotechnical standpoint, provided that the conclusions and recommendations presented in the Geotechnical Investigation are incorporated in the design and construction of the Project. Additionally, the Project would be required to comply with current engineering standards, the seismic safety requirements set forth in the earthquake regulations of the City of Los Angeles Building Code (LABC), the LAMC, and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified. Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project (dated July 23, 2020), construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. As such, the Project impacts with respect to strong seismic ground shaking would be less than significant without mitigation.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. A significant impact may occur if a project site is located within a liquefaction zone. Liquefaction is the phenomenon in which the buildup of excess pore pressures, in saturated granular soils due to seismic agitation, results in a temporary "quick" or "liquefied" condition. Loose lenses/layers of sandy soils may be subject to liquefaction when a large, prolonged, seismic event affects the site. Once the excess pore water pressure dissipates, the liquefied zones/lenses will likely consolidate causing settlement. Post liquefaction effects at a site can manifest in several ways, and may include: ground deformations, loss of bearing strength, lateral spreading, flow failure, and dynamic settlement.

According to the County of Los Angeles Safety Element, the Project Site is not located within an area identified as having a potential for liquefaction. Additionally, based on the Geotechnical Investigation, the Project Site is not located within a mapped zone of required investigation for liquefaction on the State of California Seismic Hazard Zone

Map nor within an area mapped by the City as being susceptible to liquefaction.⁴⁰ Dense silty to gravelly sands were encountered within the borings excavated on the Project Site. Based on the high standard penetration test blow counts observed, the underlying soils are considered resistant to liquefaction or seismic settlement. As such, the potential for liquefaction and associated ground deformations beneath the Project Site is considered very low. The Project will also comply with the conditions contained within the Department of Building and Safety’s Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified. Therefore, with compliance with the above regulatory compliance measures, impacts associated with the seismic related hazards including liquefaction would be less than significant without mitigation.

iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. The Project Site is not within an area identified as having a potential for slope instability according to the City of Los Angeles Safety Element. Furthermore, the Project Site and project area are not within an area identified as having a potential for seismic slope instability as designated by the “State of California Seismic Hazard Zones” map.⁴¹ The Geotechnical Investigation determined that the Project Site is nearly level and significant nearby slopes are not present. As such, the possibility for seismically induced landsliding to impact the development is considered very low to none. The Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides. Therefore, no impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. A project would normally have significant sedimentation or erosion impact if it would: (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.⁴² Although development of the Project has the potential to result in the erosion of soils during site clearing and

⁴⁰ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, Page 7, March 10, 2020.*

⁴¹ *California Geological Survey. (2014 and 1999). Earthquake Zones of Required Investigation, Hollywood Quadrangle. Seismic Hazard Zones released March 25, 1999, Earthquake Fault Zones release November 6, 2014.*

⁴² *City of Los Angeles, Los Angeles CEQA Thresholds Guide, 2006.*

construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City through grading and building permit regulations. Minor amounts of erosion and siltation could occur during site clearing. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the generally level topography of the Project Site, and the fact that the Project Site would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, fills, and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Further, the Geotechnical Investigation provided recommendations regarding temporary excavations and temporary shoring during construction of the Project.⁴³ All grading activities require grading permits from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. The standard conditions imposed by the LADBS, as specified in the Soils Report Approval Letter, will ensure that impacts to soil erosion or the loss of topsoil are less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. A project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. The Geotechnical Investigation concluded that the potential hazards associated with liquefaction are low. Lateral spreading and collapse are types of liquefaction-induced ground failures. Since the potential for liquefaction is low, the potential for lateral spreading or collapse on the Project Site are also low. Additionally, as discussed above, the probability of seismically induced landslides occurring on the Project Site is considered to have no impact due to the general lack of elevation difference across or adjacent to the Project Site. Based upon the exploration, laboratory testing, and research, the Geotechnical Investigation concluded that construction of the proposed

⁴³ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, Page 7, March 10, 2020.*

parking structure is considered feasible from a geotechnical engineering standpoint, provided the advice and recommendations presented in the Geotechnical Investigation are followed and implemented during construction. The existing fill materials are considered compressible and prone to settlement. These soils are unsuitable for the support of structural improvements and are expected to be removed and replaced with compacted fill. Groundwater was not encountered during explorations. With the implementation of the recommendations contained within the Geotechnical Investigation and the Building Code requirements as discussed above in response to Checklist Question VII (a), the potential for geologic hazards would be less than significant without mitigation.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. A significant impact may occur if the Project is built on expansive soils without proper site preparation or design features such as floor slabs or additional infill to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and which shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling, which result in heaving and cracking of both building foundations and slabs-on-grade.

As discussed in the Geotechnical Investigation, an expansion index test was performed for the on-site soils and was found to have “very low” expansive potential. Therefore, Project impacts related to expansive soil would be less than significant without mitigation.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. This question would apply to the Project only if it was located in an area not served by an existing sewer system. The Project Site is located in a developed area of the City, which is served by a wastewater collection, conveyance and treatment system operated by the City. Septic tanks or alternative disposal systems are neither necessary, nor are they proposed. Thus, no impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant impact may occur if grading or excavation activities associated with the Project were to disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site has

been previously graded and developed with a surface parking lot. The Project Site and immediate surrounding areas do not contain any unique geologic features or known vertebrate paleontological resources.⁴⁴ The Project would not include any subterranean levels. Although no paleontological resources are known to exist on-site, there remains a low potential for unknown paleontological resources to be uncovered during the construction of the parking structure. Accordingly, if paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines.

Further, if any paleontological materials are encountered during the course of Project development, all further development activities shall halt and:

- The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
- Sediment samples from the Proposed Project area should also be collected and processed to determine the small fossil potential of the Project Site.
- Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.
- Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.

⁴⁴ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Vertebrate Paleontological Resources in the City of Los Angeles, September 1996.*

The aforementioned procedures shall be enforced as a condition of approval, pertaining to paleontological resources. Thus, adherence to regulatory compliance measures and the standards, above, would ensure that any resources found during the construction phase would be handled in accordance with the proper regulations. As such, impacts to paleontological resources would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to geology and soils would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and related projects in the project area. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement applicable regulatory compliance measures and any required mitigation measures. Furthermore, the analysis of the Project’s geology and soils impacts concluded that, through the implementation of regulatory compliance measures and recommendations in the Geotechnical Investigation, Project impacts would be less than significant without mitigation. Furthermore, with respect to paleontological resources, the implementation of the conditions for inadvertent discovery described above, would ensure Project impacts to paleontological resources are reduced to less than significant levels. Because the discovery of paleontological resources would be geographically limited to the immediate area of the find, the potential for cumulative impact to occur with respect to paleontological resources would be less than significant. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Greenhouse gas (GHG) emissions refer to a group of emissions that have the potential to trap heat in the atmosphere and consequently affect global climate conditions. Scientific studies have concluded that there is a direct link between increased emission of GHGs and long-term global temperature. The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), nitrogen trifluoride (NF₃), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

Regulatory Setting

The United States Environmental Protection Agency (U.S. EPA) is responsible for implementing federal policy to address GHGs.

Federal Clean Air Act

In the past, the U.S. EPA has not regulated GHGs because it asserted that the Clean Air Act (CAA) did not authorize it to issue mandatory regulations to address global climate change. However, in 2007 the U.S. Supreme Court held that the U.S. EPA must consider regulation of motor-vehicle GHG emissions.⁴⁵ The Court did not mandate that the U.S. EPA enact regulations to reduce GHG emissions but found that the only instances in which the U.S. EPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change. In December 2009, the U.S. EPA

⁴⁵ *Massachusetts v. Environmental Protection Agency et al.* (127 S. Ct. 1438 (2007))

issued an endangerment finding for GHGs under the CAA, concluding that GHGs threaten the public health and welfare of current and future generations and that motor vehicles contribute to GHG pollution.⁴⁶ This is the first step in regulating GHGs under the provisions of the CAA. These findings provide the basis for adopting new national regulations to mandate GHG emission reductions under the Federal Clean Air Act. The EPA's endangerment finding paves the way for Federal regulation of GHGs.

Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress established mandatory GHG reporting requirements for some emitters of GHGs. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the U.S. EPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons (MT) or more a year of GHGs.

Executive Order 13432

In response to the Massachusetts v. Environmental Protection Agency ruling, the President signed Executive Order 13432 on May 14, 2007, directing the U.S. EPA, along with the Departments of Transportation, and Energy to initiate a regulatory process that responds to the Supreme Court's decision. Executive Order 13432 was codified into law by the 2009 Omnibus Appropriations Law signed on February 17, 2009. The order sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, sustainable buildings, electronics stewardship, fleets, and water conservation.

Light-Duty Vehicle Greenhouse Gas and Corporate Average Fuel Economy Standards

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applies to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpasses the prior Corporate Average Fuel Economy standards (CAFE)⁴⁷ and requires an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO₂ per mile by model year 2016, based on U.S. EPA calculation methods.

⁴⁶ *United States Environmental Protection Agency, Endangerment, and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act, website: <https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean>, accessed February 2020.*

⁴⁷ *The Corporate Average Fuel Economy standards are regulations in the United States, first enacted by Congress in 1975, to improve the average fuel economy of cars and light trucks. The U.S. Department of Transportation has delegated the National Highway Traffic Safety Administration as the regulatory agency for the Corporate Average Fuel Economy standards.*

These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO₂ per mile. According to the U.S. EPA, a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.⁴⁸ In 2017, the U.S. EPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025.

In March 2020, the U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) adopted the Safer Affordable Fuel-Efficient Vehicles Rule that maintains the CAFE and CO₂ standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO₂ standards for model year 2020 are 43.7 mpg and 204 grams of CO₂ per mile for passenger cars and 31.3 mpg and 284 grams of CO₂ per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. The final Safer Affordable Fuel-Efficient Vehicles Rule also excludes CO₂e emission improvements associated with air conditioning refrigerants and leakage (and, optionally, offsets for nitrous oxide and methane emissions) after model year 2020.⁴⁹

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced Phase I fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles from model years 2014 through 2018.⁵⁰ The U.S. EPA and the NHTSA adopted standards for CO₂ emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: (1) combination tractors, (2) heavy-duty pickup trucks and vans, and (3) vocational vehicles. According to the U.S. EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

⁴⁸ *United States Environmental Protection Agency, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.*

⁴⁹ *National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA), Federal Register/ Vol. 85, No 84/ Thursday, April 30, 2020 / Rules and Regulations, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021–2026 Passenger Cars and Light Trucks.*

⁵⁰ *United States Environmental Protection Agency, Office of Transportation and Air Quality. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles, August 2011.*

Building on the Phase I standards, in August 2016, U.S. EPA and NHTSA jointly finalized Phase 2 standards for medium- and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution to reduce the impacts of climate change. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons; save vehicle owners fuel costs of about \$170 billion; and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program.⁵¹

California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires the California Air Resources Board (CARB) to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.

The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020. As previously determined by CARB, California projected it needed to reduce GHG emissions to a level approximately 28.4% below CARB's 2020 "business-as-usual" GHG emission projections (as set forth in the 2008 Scoping Plan) to achieve this goal.⁵² The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Climate Change Scoping Plan

In December 2008, CARB approved a Climate Change Scoping Plan. The Climate Change Scoping Plan calls for a "coordinated set of solutions" to address all major categories of GHG emissions. The Initial Scoping Plan in 2008 presented the first economy-wide approach to reducing emissions and highlighted the value of combining both carbon pricing with other complementary programs to meet California's 2020 GHG emissions cap while ensuring progress in all sectors. The coordinated set of policies in the Initial Scoping Plan employed strategies tailored to specific needs, including market-

⁵¹ *Regulations for Greenhouse Gas Emission from Commercial Trucks & Buses, November 16, 2016, website: https://19january2017snapshot.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-commercial-trucks_.html.*

⁵² *CARB has not calculated the percent reduction required to achieve AB 32's mandate of returning to 1990 levels of GHG emissions by 2020. The value of 28.4% as the required reduction to achieve 1990 emissions in 2020 is an approximate value. Based on the Scoping Plan estimates and conservative rounding, the value could be 28.5%.*

based compliance mechanisms, performance standards, technology requirements, and voluntary reductions. The Initial Scoping Plan also described a conceptual design for a cap-and-trade program that included eventual linkage to other cap-and-trade programs to form a larger regional trading program.

AB 32 requires CARB to update the scoping plan at least every five years. The First Update to the Scoping Plan (First Update), approved in May 2014, presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for the long-term progress that the State endeavors to achieve. In doing so, the First Update laid the groundwork to transition to the post-2020 goals set forth in Executive Orders S-3-05 and B-16-2012.⁵³ It also recommended the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In December 2017, CARB adopted “California’s 2017 Climate Change Scoping Plan” that establishes a proposed framework of action for California to meet a 40 percent reduction in greenhouse gases by 2030 compared to 1990 levels, and substantially advance toward the 2050 climate goal of 80 percent below 1990 levels. The 2017 Climate Change Scoping Plan is part of the public process to update the AB 32 Scoping Plan to reflect Governor’s Executive Order B-30-15 and SB 32, which establish a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB and other State agencies are identifying the suite of programs, regulations, incentives, and supporting actions needed to continue driving down emissions and ensure we are on a trajectory to meet our mid- and long-term climate goals.

The 2017 Scoping Plan includes input from a range of State agencies and is the result of a two-year development process including extensive public and stakeholder outreach designed to ensure that California’s climate and air quality efforts continue to improve public health and drive development of a more sustainable economy. The 2017 Scoping Plan reflects the direction from the legislature on the Cap-and-Trade Program, as described in AB 398, the need to extend the key existing emissions reductions

⁵³ *Executive Order S-30-15 established three targets: 1) By 2010, reduce GHG emissions to 2000 levels; 2) By 2020, reduce GHG emissions to 1990 levels; 3) By 2020, reduce GHG emissions to 80 percent below 1990 levels. Executive Order B-16-2012 facilitated the commercialization of zero-emission vehicles and reestablished the 2050 target to reduce GHG emissions to 80 percent below 1990 levels.*

programs, and acknowledges the parallel actions required under AB 617 to strengthen monitoring and reduce air pollution at the community level.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the greenhouse gas (GHG) emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Additionally, SB 32 established a mid-term GHG emission reduction target for California of 40 percent below 1990 levels by 2030. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be able to trade permits (allowances) to emit GHGs.

Cap-and-trade is a market-based regulation that is designed to reduce greenhouse gases (GHGs) from multiple sources. Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Project would be exempt from the Cap-and-Trade program, since it only proposes residential uses and does not propose any industrial or high-emitting land uses.

On July 2018, CARB recently announced that greenhouse gas pollution in California fell below 1990 levels, which was the 2020 greenhouse gas emissions goal set by AB 32.⁵⁴

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations, is commonly referred to as the CALGreen Code. Statewide reductions in GHG emissions from construction is being accomplished through continuous updates to the CALGreen Code and other State- mandated laws and regulations. The CALGreen Code encourages sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. The CALGreen Code provides for design options

⁵⁴ California Air Resources Board, "Climate Pollutants Fall Below 1990 Levels for First Time" <https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time>, accessed December 2019.

allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. Originally adopted in 2008, the CALGreen Code included all voluntary standards that went beyond the basic building code requirements and introduced new standards for reducing water use, provisions for reducing and recycling construction and demolition waste, criteria for site development to locate buildings near public transit, and measures for improving indoor air quality to protect the health of building occupants. In 2010, the CALGreen Code became mandatory on a statewide basis.

City of Los Angeles Sustainable City pLAN

On April 8, 2015, Mayor Eric Garcetti released the City’s first ever Sustainable City pLAN (The pLAN). The pLAN sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAN is made up of short term (by 2017) and long term (2025 and 2035) targets for sustainability related topics including but not limited to groundwater, water use, solar power, energy-efficiency, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality. The pLAN set out an ambitious vision for cutting greenhouse gas emissions, reducing the impact of climate change and building support for national and global initiatives with targets to achieve a 45% reduction in GHG emissions below 1990 baseline levels by 2025, a 60% reduction by 2035, and an 80% reduction by 2050. According to the 3rd Annual Report for The pLAN (2017-2018), as of 2017 the City’s GHG emissions are estimated at 26.7 MMTCO_{2e}, approximately 49 percent below 1990 levels.⁵⁵ The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

LA Green Building Code

The City of Los Angeles *L.A. Green Building Code* (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures outlined later in this Section, the *L.A. Green Building Code* requires new development projects to incorporate infrastructure to support future

⁵⁵ *The 1990 baseline level is 54.1 MMTCo2e. 3rd Annual Report for The pLAN (2017-2018).*

electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 5.303.2.2 of the California Plumbing Code by 20%, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. Projects filed on or after January 1, 2017 must comply with the provisions of the Los Angeles Green Building Code. Therefore, the Project would comply with an adopted plan or regulation that was adopted in part for the purposes of reducing GHG emissions.

Connect SoCal (2020 RTP/SCS)

On September 3, 2020, SCAG’s Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region’s first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. On October 30, 2020, through Executive Order G-20-239, CARB accepted SCAG’s 2020 RTP/SCS as a GHG reduction plan.⁵⁶

Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Within the Connect SoCal Plan, the 2020 SCS would, when implemented, meet the applicable 2035 GHG emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels. CARB staff’s determination summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target. The Connect SoCal plan lays out a strategy for the region to meet these targets. The Connect SoCal SCS has been found to meet state targets for reducing GHG emissions from cars and light trucks. Connect SoCal achieves per capita GHG emission reductions relative to 2005 levels of 8 percent in 2020, and 19 percent in 2035, thereby meeting the GHG reduction targets established by the ARB for the SCAG region.

⁵⁶ *State of California, Air Resources Board, Executive Order G-20-239, website: <https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689>, accessed December 2020.*

As part of the State’s mandate to reduce per-capita GHG emissions from automobiles and light trucks, Connect SoCal presents strategies and tools that are consistent with local jurisdictions’ land use policies and incorporate best practices for achieving the state-mandated reductions in GHG emissions at the regional level through reduced per-capita vehicle miles traveled (VMT). These strategies identify how the SCAG region can implement Connect SoCal and achieve related GHG reductions. The following strategies are intended to be supportive of implementing the regional SCS: 1) focus growth near destinations and mobility options; 2) promote diverse housing options; 3) leverage technology innovations; 4) support implementation of sustainability policies; and 5) promote a green region.

SCAQMD

In October 2008, SCAQMD staff proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO₂e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds. However, this group has not met since 2010.

Project Impact Analysis

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact. Neither the SCAQMD nor the State CEQA Guidelines Amendments provide any adopted thresholds of significance for addressing a commercial, or ancillary use project’s GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City does not have an adopted quantitative threshold of significance for an institutional project’s generation of GHG emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer’s Association (CAPCOA), so long as any

threshold chosen is supported by substantial evidence. The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its “careful judgment” in making a determination of significance, and should make a “good-faith” effort to “describe, calculate or estimate” the amount of GHGs that will result from a project. The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination. A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.

The California Supreme Court’s decision published on November 30, 2015, in the Center for Biological Diversity v. California Department of Fish and Wildlife (62 Cal.4th 204) (also known as the Newhall Ranch Case) reviewed the methodology used to analyze GHG emissions in CEQA. The California Supreme Court suggested regulatory consistency as one pathway to compliance, by stating that a lead agency might assess consistency with AB 32’s goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court stated that a lead agency might assess consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities, including statewide programs and local climate action plans or GHG emissions reduction plans. This approach is consistent with CEQA Guidelines Section 15064.4.(c), which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested: “A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions” (bright line threshold approach) if supported by substantial evidence.”⁵⁷

⁵⁷ *The California State Supreme Court noted in the Newhall Ranch ruling that numeric threshold approaches may be appropriate for determining significance of GHG emissions. Center for Biological Diversity v. California Department of Fish and Wildlife (62 Cal.4th 204(2015)),*

For the Project, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City. Although State, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project’s GHG emissions.

In the absence of any adopted numeric threshold, the significance of the Project’s GHG emissions is evaluated in comparison to the SCAQMD’s interim guidance thresholds for commercial projects, which, as discussed above, is 3,000 MTCO_{2e} per year and the Project’s consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates to SB 375, SCAG’s Connect SoCal, and the L.A. Green Building Code.

Construction

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day-to-day over the approximate 12-month duration of construction activities.

Emissions of GHGs were calculated using CalEEMod (*Version 2016.3.2*) for the entire duration of the construction period and the results of this analysis are presented in Table 4.6, Project Construction-Related Greenhouse Gas Emissions. As shown in Table 4.6, the total GHG emissions from construction activities related to the Project would be approximately 452 metric tons, with the greatest annual emissions occurring in 2021.

**Table 4.6
Proposed Project Construction-Related Greenhouse Gas Emissions**

Year	CO_{2e} Emissions (Metric Tons per Year) ^a
2020	212.32
2021	239.62
Total Construction GHG Emissions	451.94
^a Construction CO ₂ values were derived using CalEEMod Version 2016.3.2 Calculation data and results are provided in Appendix E, Greenhouse Gas Emissions Worksheets.	

Operation

The Project Site is currently a surface parking lot that serves the existing AAA Headquarters office building. Therefore, there are no existing GHG emissions generated by the Project Site. The GHG emissions resulting from operation of the Project would primarily be generated by electricity use for the elevators, lighting, and re-

application of paint for maintenance. The operational emissions were calculated using CalEEMod for an unenclosed parking structure with an elevator and are summarized in Table 4.7, below, the net increase in GHG emissions generated by the Project would result in a net increase of 234.01 CO₂e MTY, which is well below the SCAQMD’s interim proposed threshold of 3,000 MTCO₂e per year. Thus, the Project would result in a less than significant impact with respect to GHG emissions without mitigation.

**Table 4.7
Proposed Project Operational Greenhouse Gas Emissions**

Emissions Source	Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year)
Area	0.02
Energy	218.93
Mobile	0.00
Waste	0.00
Water	0.00
Construction Emissions ^a	15.06
Proposed Project Total:	234.01
<i>Notes:</i> ^a The total construction GHG emissions were amortized over 30 years and added to the operation of the Project. Calculation data and results provided in Appendix E, Greenhouse Gas Emissions Worksheets.	

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. As described above and in response to Checklist Question VIII(a), the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs to the maximum extent feasible. The Project would be consistent with the Scoping Plan’s policy to (a) maximize energy efficiency building, and (b) to pursue comparable investment in energy efficiency from all retail providers of electricity in California. The Project would be designed and constructed to meet L.A. Green Building Code standards by including several measures designed to reduce energy consumption including but not limited to installing efficient lighting fixtures, low-flow landscape irrigation fixtures, electric-vehicle charging stations, and rooftop solar areas.

Through required implementation of the Green Building Code, the Project Site’s location on an infill site, the Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including CARB’s SB 32 Scoping

Plan aimed at achieving a 40 percent reduction of 1990 GHG emission levels by 2030. The following describes the benefits and applicability of the Project's compliance measures and design features that serve to reduce the carbon footprint of the development:

Infill Development. The Project is located on an infill site that is currently developed with a surface parking lot. As such, the Project Site is located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

Water Conservation. The Project would be required to develop a water budget for landscape irrigation use and install automatic irrigation systems with weather or soil moisture-based controllers.

Electric Vehicle Supply Equipment. The Project would provide electric vehicle charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment (EVSE). The incorporation of EVSE into the Project is consistent with State and City GHG policies to encourage and support alternative clean fuel supplies for vehicles and would further serve to reduce GHG emissions attributable to the vehicle trips and VMTs generated by the Project.

In addition to the GHG emission reductions described above, it is important to note that the CO₂e estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to the existing environment. This is a standard approach taken for air quality and greenhouse gas emissions analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the South Coast Air Basin and are new emissions sources, or whether they are sources that were already occurring within the Basin and merely shifted to a new location. Because the effects of GHGs are global in nature, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (commuting, shopping, etc.) to a new development that promotes shorter and fewer vehicle trips,

more walking, and overall less energy usage, then the new development would result in a potential net reduction in global GHG emissions.

Therefore, the Project's generation of GHG emissions would not make a project-specific contribution conflicting with an applicable plan, policy or regulation for the purposes of reducing the emissions of greenhouse gases, and the Project's impacts would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to greenhouse gas emissions would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Pursuant to the Office of Planning and Research's (OPR) recently published Discussion Draft on CEQA and Climate Change (December 2018), in determining the significance of a project's GHG emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. It is the increased accumulation of GHG emissions from more than one project, such as related projects, and many sources in the atmosphere that may result in global climate change, which can cause the adverse environmental effects previously discussed. Accordingly, the threshold of significance for GHG emissions determines whether a project's contribution to global climate change is "cumulatively considerable." Many regulatory agencies, including the SCAQMD, concur that GHG and climate change should be evaluated as a potentially significant cumulative impact, rather than a project direct impact. Accordingly, the GHG analysis presented above indicates that the Project's generation of GHG emissions would be below the SCAQMD's interim threshold of significance for commercial projects (3,000 MTCO_{2e} per year) and thus would be considered less than significant at a cumulative level. Furthermore, the Project would be consistent with all applicable local ordinances, regulations and policies that have been adopted in furtherance of the State and City's goals of reducing GHG emissions. Thus, the Project would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant without mitigation.

IX. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following section summarizes and incorporates the reference information contained in the Phase I Environmental Site Assessment Report for 640-700 West 27th Street, Los Angeles, CA 90007 (“Phase I ESA”), prepared by Priority One Environmental, dated January 14, 2020. The Phase I ESA is included as Appendix E to this IS/MND.

Regulatory Setting

Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 and provides the framework for the national hazardous and non-hazardous waste management systems (United States Code [USC], Title 42, Chapter 82). This framework includes the determination of whether hazardous wastes are being generated, and techniques for tracking wastes to eventual disposal (cradle to grave responsibility).

Occupational Safety and Health Administration

Title 29 Code of Federal Regulations (CFR), Part 1910, contains the Occupational Safety and Health Administration (OSHA) requirements for workers regarding hazardous waste management operations and emergency responses involving hazardous waste. These regulations promote worker safety, other training, and a worker's right-to-know.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," creates national policy and procedures to identify and clean up sites where hazardous substances have been released into the environment and provides statutory definitions of hazardous substances and petroleum products under 42 USC Chapter 103.

Superfund Amendment and Reauthorization Act

The Superfund Amendment and Reauthorization Act (SARA), Title III of the 1986 Emergency Planning and Community Right to Know Act (42 USC Chapter 116), which requires facilities to report items on USEPA Toxic Chemical Inventory Reporting Forms.

Toxic Substances Control Act

The Toxic Substances Control Act (15 USC Section 2601 *et seq.*) (TSCA), adopted in 1976, regulates the introduction of new or already existing chemicals. The TSCA provides the U.S. EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States, by authorizing it to require reporting, record-keeping, testing requirements, and restrictions relating to chemical substances

and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics and pesticides. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), ACMs, radon and LBP.

State

Hazardous Waste Control Law

The Hazardous Waste Control Law (HWCL) empowers the Department of Toxic Substances Control (DTSC), a division of California Environmental Protection Agency (CalEPA) (formerly part of the Department of Health Services), to administer the state's hazardous waste program and implement the federal program in California. California Code of Regulations (CCR) Titles 22 and 23 address hazardous materials and wastes. Title 22 defines, categorizes, and lists hazardous materials and wastes. Title 23 addresses public health and safety issues related to hazardous materials and wastes and specifies disposal options.

Department of Toxic and Substances Control

The DTSC has the primary responsibility for enforcement and implementation of hazardous waste control laws in the State. The mission of DTSC is to protect California's people and environment from harmful effects of toxic substances by restoring contaminated resources, enforcing hazardous waste laws, reducing hazardous waste generation, and encouraging the manufacture of chemically safer products. However, this responsibility is shared with other state and local government agencies, including the State Water Resources Control Board (SWRCB), the Los Angeles Regional Water Quality Control Board (LARWQCB), and city and county governments.

California Health and Safety Code

The California Health and Safety Code and the related regulations in California Code of Regulations require local governments to regulate local business storage of hazardous materials in excess of certain quantities. The law also requires that entities storing hazardous materials be prepared to respond to releases. Those using and storing hazardous materials are required to submit a Hazardous Materials Business Plan (HMBP) to their local certified unified program agency (CUPA) and to report releases to their CUPA and the State Office of Emergency Services.

California OSHA Program (Cal-OSHA)

Cal-OSHA is responsible for developing and enforcing workplace safety standards and assuring worker safety in the handling and use of hazardous materials. Cal-OSHA (codified in the CCR, Title 8 generally and in the California Labor Code Sections 6300 *et seq.*) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal-OSHA is very similar to the Federal OSHA program. Among other provisions, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP) for potential workplace hazards, including those associated with hazardous materials.

Hazardous Materials Release Response Plans and Inventory Law of 1986

The Hazardous Materials Release Response Plans and Inventory Law of 1986 (Assembly Bill [AB] 2185; HSC Section 25500, *et seq.*) governs hazardous materials handling, reporting requirements, employee training, and local agency surveillance programs.

Proposition 65

Proposition 65 (CCR Title 22, Section 12000, *et seq.*) focuses on carcinogenic or teratogenic contaminants. Proposition 65 establishes a list of chemicals and substances and the level at which they are believed to potentially cause cancer. Proposition 65 restricts the discharge of listed chemicals at certain levels into known drinking water sources, requires public notification of unauthorized discharges, requires clear warning prior to a known and intentional exposure to a listed substance, and establishes a right of action for citizens and separate notice requirements for government employees and counties.

California Health and Safety Code

California HSC, Division 20, Chapter 6.7, governs the State's Underground Storage Tank (UST) program and regulates the program in CCR Title 23, Division 3, Chapter 16 and 17.

Regional

Regional Water Quality Control Board

The SWRCB and the nine Regional Boards work together to protect the quality of water in waters such as lakes, estuaries, rivers, streams, and groundwater. By protecting water quality, these regulatory Boards seek to protect the "beneficial uses" or the many

activities, uses and habitats that waters can support. Under CWC Sections 13267 and 13304, the Regional Board is authorized to require soil and groundwater investigations, site inspections, monitoring, and to request work plans from a responsible party for an assessment and/or cleanup project. The Regional Board may assess fines in cases of noncompliance.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) regulates the emission of vapors from contaminated soils, transfer facilities, accidental spillage or other deposition of contaminants. Any party who wishes to excavate or treat soils that are contaminated with total petroleum hydrocarbons (TPH) and/or solvents must obtain the appropriate permit before beginning the field work.

Local

Los Angeles Fire Department, Hazardous Materials Section

(LAMC Chapter 5, Article 7 (commonly called the “City of Los Angeles Fire Code” [Fire Code]), sets forth laws for hazardous material storage and handling, and safe guarding of life and property from fire, explosion, panic, or other hazardous conditions that may arise in the use of buildings, structures or other premises.

Project Impact Analysis

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. The Project includes the construction of a 4.5-story parking structure on a site that is currently improved with a surface parking lot.

Based on the findings of the Phase I ESA, no recognized environmental conditions (REC) were identified during the visual site reconnaissance or in records reviewed. Construction of the Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers’ instructions and handled in compliance with applicable standards and regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept

such waste based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. During operation of the Project, no hazardous materials are anticipated to be routinely transported to the Project Site, since the Project would consist of a parking structure. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant without mitigation.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. Based on the findings of the Phase I ESA, no RECs were identified during the visual site reconnaissance or in records reviewed. (See Appendix E to this MND). Based on a review of Sanborn Maps, the Phase I ESA identified past uses on the Project Site as including residential dwellings as early as 1907. Prior to 1907 the Project Site was vacant land. By 1969 the property was developed with 32 multifamily dwellings and six single family residences. In 1970 the residential uses were demolished and the property was improved with a surface parking lot, which reflects the current conditions of the Project Site. Based on the Department of Toxic Substances Control EnviroStor Database, the Project Site is not listed for cleanup, permitting, or investigation of any hazardous waste contamination.⁵⁸ The Phase I ESA indicated that the Project Site is listed in the Environmental Records Sources searched under the CERS, FINDS, and EMI databases; however the records are likely an error as they are associated with the University of California Physical Plant,⁵⁹ which does not occur on the Project Site. The Project Site has been a surface parking lot since 1969. Construction of the Project would not handle, dispose, or store any hazardous materials with the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Additionally, the

⁵⁸ California, Department of Toxic Substances Search EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed December 2019.

⁵⁹ The CERS ID is 110013999600, Description: US EPA Air Emission Inventory System (EIS). The EMI database lists the site in 1987 with an emission of total organic hydrocarbon gasses (1 ton/year). Carbon Monoxide Emissions 4 tons/year, NO_x Oxides of Nitrogen 4 tons/year, SO_x Oxides of Sulphur 14 tons/year, Particulate matter 1 ton/year, part. Matter 10 micrometers and smaller 1 ton/year.

Project, once operational, would not create any significant hazardous or accidental conditions involving the release of hazardous materials into the environment. As such, the Project's impacts associated with the release of a hazardous material would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard (i.e., such as exposure to lead based paint, polychlorinated biphenyls, or asbestos). The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design would reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.⁶⁰

There is one Los Angeles Unified School District (LAUSD) school within one-quarter mile of the Project Site: Frank D. Lanterman High School, located at 2328 St. James Place, located approximately 0.21 miles north of the Project Site. Localized and temporary construction impacts associated with noise, dust and localized air quality emissions, and construction traffic/hauling activities generally occur within an area of 500 feet or less of the Project Site. As shown in Table 4.3, Localized On-Site Peak Daily Construction Emissions, (in Section III, Air Quality) peak daily emissions generated during construction would be below the SCAQMD's applicable construction localized significance thresholds for an approximate two-acre site in SRA 1. Since no schools are located within 500 feet, localized emissions from construction activities from the Project would not create a hazard to any nearby schools. Further, the proposed haul route exiting the Project Site to Sunshine Canyon Landfill would travel north along Figueroa Street and west along 18th Street to I-110 Freeway on-ramp. The haul route exiting the

⁶⁰ City of Los Angeles, Los Angeles CEQA Thresholds Guide, 2006.

I-110 Freeway would exit the Figueroa Street off-ramp and travel east along Figueroa Street and W. 27th Street to the Project Site. The haul route to the 25th Street Recycling facility or Waste Management Downtown Diversion facility would travel along north along Figueroa Street, and utilize the 18th Street on-ramp to the I-10 Freeway. The local haul routes would not pass by any nearby schools. Therefore, construction impacts to nearby schools would be less than significant without mitigation.

No hazardous materials other than the modest amounts of typical cleaning supplies and solvents used for maintenance and janitorial purposes would be present at the Project Site, and the acquisition, use, handling, and disposal of these substances would comply with all applicable federal, State, and local requirements. The operational activities of the Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, operational impacts on nearby schools would be less than significant without mitigation.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. A significant impact may occur if the Project Site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

The Project Site is not listed in any government database for having hazardous wastes or released hazardous materials.⁶¹ As discussed above, the Phase I ESA indicated that the Project Site is listed in the Environmental Records Sources searched under the CERS, FINDS, and EMI databases; however the records are likely an address error as they are associated with the USC Physical Plant which does not occur on the Project Site, which is approximately one foot southwest of the Project Site. The Project Site has been a surface parking lot since 1960. Additionally, the Phase I ESA identified cases associated with surrounding properties that are listed in the EDR Database Report for regulatory database listings, permitted facilities listings, closed/remediated cases, and historical database listings. The Automobile Club of Southern California located at 2601

⁶¹ California, Department of Toxic Substances Search EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed December 2019.

S. Figueroa, approximately 245 feet northeast of the Project Site, has three 10,000-gallon tanks containing waste oil and regular motor vehicle fuel. The site has stored and disposed of off-site waste oil, solvents, and PCBs containing material since 1985. The Exxon Mobil Corp. gas station located at 2598 S. Figueroa Street, approximately 484 feet east of the Project Site, has a record of a closed leaking underground storage tank (LUST) case, for which soil remediation was completed and closed in 2006. Another gas station located at 2598 S Figueroa Street, approximately 646 feet east of the Project Site, is listed as a gasoline service station from 1969 to 1977 and is listed as Historical under the Los Angeles UST database. Mom's Cleaner's located at 2520 S. Figueroa Street, approximately 728 feet northeast of the Project Site, also appears on the regulatory database as an operating drycleaner from 1993 to 2014. The Mom's Cleaner's site is currently listed as inactive. Based on indicated groundwater directional flow and their distances, none of these sites are anticipated to impact the Project Site.⁶² As such, the Project would not exacerbate existing environmental conditions. Development of the Project would not create a significant hazard to the public or the environment. Therefore, the Project would result in a less than significant impact without mitigation.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant project-related impact may occur if the Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard. The closest public airport to the Project Site is the Los Angeles International (LAX) Airport, which is located approximately 8.5 miles to the southwest of the Project Site. However, the airport is not located within two miles of the Project Site. Furthermore, the Project Site is not in an airport hazard area. Therefore, no impact would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A project would normally have a significant impact to hazards and hazardous materials if: (a) the project involved possible interference with an emergency response plan or emergency evacuation plan. The determination of significance shall be made on a case-by-case basis considering the degree to which the

⁶² *Priority One Environmental, Phase 1 Environmental Site Assessment Report, 640-700 West 27th Street, Los Angeles, Ca 90007, Page 15, January 14, 2020 (Appendix E to this IS/MND).*

project may require a new, or interfere with an existing emergency response or evacuation plan, and the severity of the consequences. The Project Site is not located in a disaster route according to the Los Angeles Central Area Disaster Route Map of Los Angeles County.⁶³ Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.⁶⁴ Development of the Project Site may require temporary and intermittent partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access, or travel upon public rights-of-way. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur without mitigation.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The Project Site is located in a highly urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).⁶⁵ Therefore, no impacts from wildland fires are expected to occur.

Mitigation Measures

Project impacts with regard to hazardous materials would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Development of the Project in combination with the related projects have the potential to increase to some degree the risks associated with the use and potential accidental release of hazardous materials in the City. However, the potential impact associated

⁶³ Los Angeles County Department of Public Works, *City of Los Angeles Central Area Disaster Route Map*, August 13, 2008.

⁶⁴ City of Los Angeles, *Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles*, April 1995.

⁶⁵ City of Los Angeles, Department of City Planning, *City of Los Angeles Zoning Information and Map Access System (ZIMAS)*, website: <http://zimas.lacity.org>, accessed November 2019.

with the Project would be less than significant with adherence to all applicable regulations and, therefore, would not be cumulatively considerable. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in conjunction with the development proposals for each of those properties. Further, local municipalities are required to follow local, State, and federal laws regarding hazardous materials, which would further reduce impacts associated with the related projects. Therefore, with compliance with local, State, and federal laws pertaining to hazardous materials, the Project in conjunction with related projects would be expected to result in less than significant cumulative impacts with respect to hazardous materials.

X. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Clean Water Act of 1972

The federal Clean Water Act (CWA) was first enacted in 1948 to (1) restore and maintain the chemical, physical, and biological integrity of the Nation's waters by preventing point and nonpoint pollution sources, (2) provide assistance to publicly owned treatment works for the improvement of wastewater treatment, and (3) maintain the integrity of wetlands. With subsequent amendments, current regulations provide that discharges of stormwater to waters of the United States from industrial activities and from construction activities that encompass one acre or more of soil disturbance are effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit.

The CWA directs states to establish water quality standards for all “waters of the United States” and to review and update such standards on a triennial basis. The U.S. EPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs in California to the State Water Resources Control Board (SWRCB), and nine Regional Water Quality Control Boards (RWQCB). CWA Section 303(c)(2)(b) requires states to adopt water quality standards for all surface waters of the United States based on the water body’s designated beneficial use. Water quality standards for the Los Angeles region are set forth in The Water Quality Control Plan Los Angeles Region Basin Plan (1995, and as amended in 2010), which is administered by the LARWQCB.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter- Cologne Act) establishes the SWRCB and each RWQCB as the principal state agencies for coordinating and

controlling water quality in California. Specifically, the Porter-Cologne Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the State (including both surface and groundwater) and directs the RWQCBs to develop regional Basin Plans. California Water Code Section 13170 also authorizes the SWRCB to adopt water quality control plans on its own initiative. The Porter-Cologne Act is administered in the CPAs by the LARWQCB and is implemented at the city level through various programs.

Statewide NPDES General Construction Activity Stormwater Permit

Pursuant to the CWA Section 402(p) and the Porter-Cologne Act, the SWRCB has issued a statewide NPDES General Permit under Order No. 2009-0009-DWQ, NPDES No. CAR000002, which was adopted on September 2, 2009.¹⁴ The Order requires that construction activities obtain a permit and submit a Notice of Intent (NOI) along with the appropriate fee to the SWRCB. Construction activities subject to the NPDES General Permit include clearing, grading, and disturbances to the ground, such as stockpiling or excavation, that result in soil disturbances of one acre of total land area or more.

Prior to obtaining the Stormwater Permit, an adequate Stormwater Pollution Prevention Plan (SWPPP) has to be prepared. The SWPPP specifies BMPs that will prevent construction pollutants from contacting stormwater with the intent of keeping all products of erosion from moving offsite into receiving waters. BMPs are intended to diminish impacts to the Maximum Extent Practicable (MEP), which is a standard developed by Congress to allow regulators the flexibility needed to shape programs to the site-specific nature of municipal stormwater discharges. The SWPPP includes a description of: (1) the site, (2) erosion and sediment controls, (3) means of waste disposal, (4) implementation of approved local plans, (5) control of post-construction sediment and erosion control measures and maintenance responsibilities, and (6) non-stormwater management controls. Dischargers are also required to inspect their construction sites before and after storms to identify stormwater discharge associated with construction activity and to identify and implement controls where necessary.

Municipal Separate Storm Sewer Permit (MS4 Permit).

Discharges of urban runoff into municipally-owned separate storm sewer systems (MS4s) are regulated under the general NPDES stormwater permit that has been issued by the RWQCB for Los Angeles County (“MS4 Permit”). Development that could occur under the Proposed Plans would be subject, as applicable, to the waste discharge requirements issued by the RWQCB for the MS4 Permit.

The City of Los Angeles is a co-permittee under the MS4 Permit, and therefore has joint/concurrent legal authority to enforce the terms of the permit within its jurisdiction, including the CPAs. The MS4 Permit is intended to ensure that combinations of site planning, source control and treatment control practices are implemented to protect the quality of receiving waters. The permit requires that new development employ best management practices (BMPs) designed to control pollutants in stormwater runoff to the maximum extent practicable (MEP), details specific sizing criteria for BMPs, and specifies flow control requirements. Site design or planning management BMPs are used to minimize runoff from new development and to discourage development in environmentally sensitive areas that are critical to maintaining water quality. These BMPs include structural practices, source control and treatment techniques and systems, and site design planning principles addressing water quality.

Among other things, the MS4 Permit requires the co-permittees to prepare a Stormwater Quality Management Plan (SQMP) specifying the BMPs that will be implemented to reduce the discharge of pollutants in stormwater to the MEP. For development within the City of Los Angeles (which would include the CPAs), the SQMP is implemented through the City’s Standard Urban Stormwater Mitigation Plan (SUSMP).

Project Impact Analysis

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB) through its nine Regional Boards. The Project Site lies within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Applicable regulations include the NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduce

potential water quality impacts during the construction and operation of a project, the Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City and Ordinance 173,494.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the Project include: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

Prior to issuance of a grading permit, the Applicant will be required to obtain coverage under the SWRCB's NPDES Construction General Permit. Under the Construction General Permit Order 2009-0009-DWQ, dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation. The Applicant shall provide the Waste Discharge Identification Number to the City to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. As such, the implementation of the code-required SWPPP and compliance with Ordinance No. 173,494 would ensure that the Project's construction-related water quality impacts would be less than significant without mitigation.

Operation

The Project Site is currently developed with a surface parking lot, and is completely covered with impervious surfaces. Thus, 100 percent of the surface water runoff from

the Project Site is directed to adjacent storm drains located north of the Project Site along W. 27th Street.⁶⁶ Following completion of construction, the Project and the Project Site as a whole would continue to generate surface water runoff, and runoff would be directed to existing stormwater inlets in a similar manner as existing conditions and there would not be any increased imperviousness of the Project Site. The Project's potential impacts to surface water runoff would be reduced to a less than significant level by incorporating stormwater pollution control measures as set forth below that would regulate the amount and water quality of stormwater leaving the Project Site.

In November 2012, the City adopted Order No. R4-2012-0175 the NPDES Stormwater Permit for the County of Los Angeles and cities within (NPDES No. CAS004001). The primary objectives of the stormwater program requirements are to: (1) effectively prohibit non-stormwater discharge; and (2) reduce the discharge of pollutants from stormwater conveyance systems to the maximum extent practicable statutory standard.

The Project would be required to comply with the City of Los Angeles Stormwater and Urban Runoff Pollution Control Ordinance (Ordinance No. 172,176, effectuated October 1998), which established LAMC Sections 64.70 through 64.70.13 and set the foundation for stormwater management in the City. Since the adoption of the Stormwater and Urban Runoff Pollution Control Ordinance, many additional ordinances have passed to keep LAMC Article 4.4, Stormwater and Urban Runoff Pollution Control, up to date. Approved in October 2011, the Low Impact Development (LID) Ordinance (Ordinance No. 181,899) expanded LAMC Article 4.4 and expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater low impact development strategies on projects that require building permits. LAMC Article 4.4, including LID requirements, was amended in August 2015 with the approval of Ordinance No. 183,833, which incorporates the requirements of the Municipal Separate Storm Sewer (MS4) Permit. The Project would be required to prepare a LID Plan and demonstrate compliance with the LID requirements and standards and retain or treat the first ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater.⁶⁷

The Project falls within the second tier of the LID Ordinance requirements, which state that development projects that involve non-residential uses and result in an alteration of at least 50 percent or more of the impervious surfaces on an existing developed site,

⁶⁶ *City of Los Angeles, Bureau of Engineering, Navigate LA, website: <http://navigatela.lacity.org/navigatela/>, accessed November 2019.*

⁶⁷ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

the entire site must comply with the standards and requirements of Article 4.4 of Chapter VI of the LAMC and with the Development Best Management Practices Handbook. The Project shall be designed to manage and capture stormwater runoff to the maximum extent practicable utilizing various LID techniques, including but not limited to infiltration, evapotranspiration, capture for use, and treated through high removal efficiency bio-filtration / bio-treatment systems of all runoff on-site (listed in priority order). Development and redevelopment projects are required to prepare a LID Plan, which complies with the provisions of the Development Best Management Practices Handbook. If partial or complete on-site compliance of any type is technically infeasible, the Project and LID Plan shall be required to manage the flow from the SWQDv on-site in order to maximize on-site compliance. Compliance with the LID requirements would reduce the amount of surface water runoff leaving the Project Site as compared to existing conditions.⁶⁸

In compliance with the LID ordinance requirements, prior to issuance of grading permits, the Applicant shall submit a LID Plan and design plans to the City Department of Building and Safety and the Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The BMPs shall be designed to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event (whichever is greater), in accordance with the Planning and Land Development Handbook for Low Impact Development, Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet the numerical threshold standard shall be provided.

To ensure that all stormwater related BMPs are constructed and/or installed in accordance with the approved LID Plan, the City requires a Stormwater Observation Report to be submitted to the City prior to the issuance of the Certificate of Occupancy. All projects reviewed and approved would require a Stormwater Observation Report and would be prepared, signed, and stamped by the engineer of record responsible for the approved LID Plan. With approval and issuance of a Certificate of Occupancy from LADBS, the Project would be determined to be in compliance with all applicable codes, ordinances, and other laws.⁶⁹

⁶⁸ *Ibid.*

⁶⁹ *City of Los Angeles, Planning and Land Development Handbook for Low Impact Development (LID), Part B Planning Activities, 5th Edition, May 9, 2016.*

Full compliance with the LID requirements and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Therefore, as the Project would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. A project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed in response to Checklist Question X (a) the Project Site is approximately 100 percent impervious. As such, 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was not encountered during exploration, conducted to a maximum depth of 51.5 feet below the existing ground surface. According to information presented in the “Seismic Hazard Zone Report for the Hollywood 7.5-minute Quadrangle”, historical high groundwater depths on the Project Site are on the order of 60 feet.⁷⁰ The Project would not include any subterranean levels. Excavation would be limited to the building foundations only. As such, because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Project would not interfere with groundwater recharge. Therefore, the Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant without mitigation.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

⁷⁰ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, March 10, 2020. (See Appendix C of this IS/MND).*

i. Result in substantial erosion or siltation on- or off-site.

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial erosion, siltation, pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. The Project Site is located in a highly urbanized area within the City, and no streams or river courses are located on the Project vicinity. The Project is an infill development project on a site that is currently developed. Implementation of the Project would not increase site runoff or result in any changes in the local drainage patterns, since implementation of the LID Plan would reduce the amount of surface water runoff after storm events. Regulatory compliance measures would ensure that runoff leaving the Project Site would not result in substantial erosion or siltation during the construction and operational phases of the Project.

Minor amounts of erosion and siltation could occur during site preparation. The potential for soil erosion would be controlled, since the Project would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills and a Storm Water Pollution Prevention Plan (SWPPP), which would be required to be prepared and implemented for the Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. Further, the Geotechnical Investigation provided recommendations regarding temporary shoring during construction of the Project. The standard conditions imposed by the City of Los Angeles Department of Building and Safety, as specified in the Soils Report Approval Letter, will ensure that impacts to soil erosion and siltation are less than significant without mitigation.

(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Less Than Significant Impact. A project would normally have a significant impact on surface water hydrology (and the rate and amount of surface water) if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow or would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

The Project Site is located in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The portion of the Project Site proposed for demolition is nearly 100 percent impervious. Implementation of the Project would not increase site runoff or result in any changes in the local drainage patterns. Implementation of the SWPPP, however, would reduce the amount of surface water runoff after storm events, as the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Project would not increase the rate or amount of flow from the Project Site or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. Impacts associated with localized drainage and surface water runoff would therefore be considered less than significant without mitigation.

(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with the project would create substantial additional sources of pollution, contamination, or nuisance as defined in Section 13050 of the CWC or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level, which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increases the probability that polluted runoff would reach the storm drain system.

The Project Site is currently developed, and a majority of the surface water is directed off site to the adjacent storm drain inlet along W. 27th Street. Storm water retention will be required as part of the LID/SUSMP implementation features. Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. Accordingly, the Project would be required to demonstrate compliance with the LID Ordinance standards and retain or treat the first 3/4 inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater, which would reduce the Project's impact to the stormwater infrastructure. As discussed above in response to Checklist Question IX (b),

the Geotechnical Investigation concluded based on conditions encountered at the time of exploration, groundwater is not anticipated during construction of the Project. Therefore, the Project would not provide substantial additional sources of polluted runoff, and potential impacts to surface water quality would be less than significant without mitigation.

iv. Impede or redirect flood flows?

Less Than Significant Impact. A significant impact may occur if the Project was located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area.⁷¹ A review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Map No. 06037C1619G, dated December 21, 2018, indicates that the site is located in an area designated as “Zone X”, described as “areas determined to be outside the 0.2 percent flood plain.” Therefore, the flood hazards at the Project Site are anticipated to be a low potential. The Project Site is located in a highly urbanized area and, as no changes to the local drainage pattern are anticipated to occur with implementation of the Project, it would not have the potential to impede or redirect floodwater flows. Therefore, a less than significant impact would occur without mitigation.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. A significant impact would occur if the Project Site is sufficiently close to the ocean or other water body (levee or dam) to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami) and if discharges associated with the project operation would create pollution and contamination due to inundation. Seiches are large waves generated in very large enclosed bodies of water or partially enclosed arms of the sea in response to ground shaking. Tsunamis are waves generated in large bodies of water by fault displacement or major ground movement.

According to the FEMA’s flood insurance rate map, the Project Site is outside of a 100-year flood area.⁷² However, a review of the City of Los Angeles General Plan Safety Element, the Project lies within a potential inundation or tsunami hazard zone from the

⁷¹ *City of Los Angeles, Department of City Planning, General Plan Elements, Safety Element Exhibit F, website: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed November 2019.*

⁷² *Ibid.*

Franklin Canyon Reservoir.⁷³ However, based on information provided by the Geotechnical Investigation, owing to the Project Site's significant distance from both the ocean and an enclosed body of water, the risk of seismically induced flooding due to a tsunami or seiche is also considered low to nil.⁷⁴

Additionally, the Project, once operational, would not use hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes typically associated with the operation of the Project. The use of these substances would comply with State health codes and regulations. Furthermore, the Project would be designed and constructed with the guidance of the Department of Building and Safety. The City of Los Angeles Department of City Planning and Department of Building and Safety would review the Project prior to the issuance of a building permit and provide recommendations to ensure that any impacts from the risk release of pollutants due to inundation would be less than significant without mitigation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. A project would result in a significant impact if it has the potential to conflict with a water quality control plan or sustainable groundwater management plan. As discussed in response to Checklist Question IX (a), above, the portion of the Project Site proposed for demolition is nearly 100 percent impervious, with the exception of on-site landscaping. As such, almost 100 percent of the surface water runoff from the Project Site is directed to adjacent storm drains and does not percolate into the groundwater table beneath the Project Site. Groundwater was not encountered during exploration, conducted to a maximum depth of 51.5 feet below the existing grade. The highest historic groundwater data for the Project Site and immediate surrounding area is 60 feet below grade. The Project would not include any subterranean parking levels. Because the depth of groundwater is sufficiently lower than the depth of proposed excavation, construction of the Project would not deplete groundwater supplies or interfere substantially with groundwater recharge. Additionally, adherence to Article 4.4 of the LAMC would ensure that the Project would not interfere with groundwater recharge. Therefore, the Project would not deplete groundwater supplies, and impacts to the groundwater table would be less than significant without mitigation.

⁷³ *City of Los Angeles Department of City Planning, General Plan Safety Element, Safety Element Exhibit G: Inundation & Tsunami Hazard Areas In the City of Los Angeles, March 1994.*

⁷⁴ *Advanced Geotechnical Solutions, Inc., Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California, March 10, 2020. (See Appendix C of this IS/MND).*

Mitigation Measures

Project impacts with regard to water quality would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in combination with related projects would result in the further infilling of uses in an already dense urbanized area. As discussed above, the Project Site and the surrounding areas are served by the existing City's drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects in the Project vicinity would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related project sites, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the LID Ordinance, each related project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction of surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant without mitigation.

XI. Land Use and Planning

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- a. Physically divide an established community?
- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Regulatory Setting

At the regional level, the Project Site is located within the planning area of SCAG, the Southern California region’s federally designated metropolitan planning organization. The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the SCAQMD. At the local level, development of the Project Site is guided by the General Plan of the City, the South Los Angeles Community Plan, the Exposition/University Park Redevelopment Project Plan (ZI-2488), the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District (ZI-2397), the LAMC, the South Central Los Angeles Alcohol Sales Specific Plan (ZI-1231), and the Freeway Adjacent Advisory Notice (ZI-2427), all of which are intended to guide local land use decisions and development patterns. Each guiding plan and ordinance is discussed in more detail, below.

Project Impact Analysis

a) Physically divide an established community?

No Impact. A significant impact may occur if a project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. The determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number,

degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Project.

The Project Site is located within a highly urbanized area of the City and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The parcel to the north of the Project Site includes a commercial office campus with associated surface parking (AAA Headquarters). Multi-family residential buildings are located to the east and west, which range in height from two to four-stories above grade. One- to two-story fraternity houses are located south of the Project Site. No separation of uses or disruption of access between land use types would occur as a result of the Project. The Project would replace a surface parking lot with a 4.5-story parking structure, which would not change the existing land uses. Accordingly, implementation of the Project would not disrupt or divide the physical arrangement of the established community, and no impact would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the Project Site, and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

Regional Plans

SCAQMD Air Quality Management Plan

The Project is located within the South Coast Air Basin and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The SCAQMD’s most recent Air Quality Management Plan (AQMP) was updated in 2017 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a non-attainment area. The Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. Furthermore, as noted in Section III, Air Quality, the Project would not exceed the daily emission thresholds during the construction or operational phases of the Project. Therefore, the Project would be consistent with the AQMP.

SCAG Connect SoCal (2020 RTP/SCS)

The Project Site is located within the six-county region that comprises the SCAG planning area. On September 3, 2020, SCAG's Regional Council adopted the Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy). In 2012, SCAG adopted the region's first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) – a plan that the Regional Council now calls Connect SoCal. Connect SoCal charts a path toward a more mobile, sustainable and prosperous region by making connections between transportation networks and between planning strategies. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The Project would be consistent with the goals and policies set forth in the Connect SoCal plan, as the Project would redevelop a site that is currently developed with a surface parking lot and would include the construction of an above-grade parking structure. As the Project would result in a net increase of approximately 503 vehicle parking spaces, which is intended to serve the existing AAA Headquarters building, the Project would not result in a direct increase of population growth. Therefore, the development of the Project would be consistent with SCAG growth projections.

Local Plans

City of Los Angeles General Plan

The Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element / Public Recreation Plan, Safety Element, Mobility Element, a Plan for a Healthy Los Angeles, and the Land Use Element. The Land Use Element is comprised of 35 community plans.

The elements that would be most applicable to the Project are the Framework Element and the Land Use Element. The Project Site is currently zoned RD1.5-1-O. The RD zoning designation corresponds with the existing Restricted Density Multiple Dwelling Zone land use designation on-site. The Applicant is seeking a zone change and height district change from RD1.5-1-O to C2-2-O. The C2 zone allows for the proposed parking structure. Additionally, the Applicant requests a General Plan amendment to change the Project Site's land use designation from Low Medium II Residential to Community Commercial within the South Los Angeles Community Plan (Community Plan).

Framework Element

The General Plan's Framework Element provides citywide guidelines and a foundation upon which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. The General Plan's Framework Element was adopted on December 11, 1996 and re-adopted on August 8, 2001. The Framework Element and the City's community plans discuss population, housing and employment to the year 2010. The Framework Element identifies a projected population of 4.3 million people living in 1,566,108 housing units. The Citywide General Plan Framework and the Community Plan provide growth projections and CPA capacity, respectively, for the year 2010. The Community Plan recognizes that the Community Plan Area (CPA) may grow that population, jobs, and housing could grow more quickly, or slowly, than anticipated depending on economic trends.

The Framework Element provides citywide guidelines and a foundation on which Community Plans and other General Plan Elements can base their more specific goals, objectives, and policies. Table 1 of Appendix L to this IS/MND, includes the consistency analysis with the Framework Element's goals, objectives, and policies relevant to the Project. The Project would be consistent with the Framework Economic Development Chapter's goals and objectives that focus on commercial competitiveness, job creation and retention, and economic prosperity for the City. The Project is in substantial conformity with the purposes, intent and provisions of the General Plan Framework Element, and the applicable Community Plan by providing a smart growth oriented, dense urban project where such growth is best accommodated based on its proximity to mass transit. As such, the Project would be consistent with the objectives and policies set forth in the Framework Element of the General Plan.

South Los Angeles Community Plan

The Project Site is located within the South Los Angeles Community Plan area (South Los Angeles CPA). The South Los Angeles CPA is located approximately three miles southwest of Downtown and covers over fifteen square miles of land area. The South Los Angeles CPA is characterized by diverse neighborhoods rich in cultural and historic character. The South Los Angeles CPA is generally bounded by Pico Boulevard to the north, Figueroa Street and Harbor Freeway (I-110) to the east, Century Boulevard, 105th, 108th and 120th Streets to the south, and Van Ness and Arlington Avenues to the west. The Community Plan was recently adopted on November 22, 2017 and effective December 29, 2018. The Community Plan is a component of the City's General Plan Land Use Element. It outlines a vision for the long-term physical development, economic revitalization, and community enhancement of South Los Angeles, and sets forth actions to achieve the community's vision.

The Project would replace an existing surface parking lot with 247 parking spaces with a new 4.5-story parking structure with 750 parking spaces to serve the nearby AAA Headquarters. A detailed analysis of the consistency of the Project with the applicable goals and policies of the Community Plan for Commercial Land Uses is presented in Table 2 of Appendix L, Consistency Analysis Tables, to this IS/MND. The Project would be an infill, urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the South Los Angeles Community Plan. The Project would conform to the goals, objectives, and land uses identified in the South Los Angeles Community Plan.

Exposition/University Park Redevelopment Project Plan

The Project Site is located in the Exposition/University Park Redevelopment Project area, formerly known as the Hoover Redevelopment Project. The Redevelopment Plan was first effective in 1969. Since then, the Redevelopment Plan has been amended five times. The Project Site was not added to the Redevelopment Project area until the Fourth Amendment dated May 11, 1983.⁷⁵

The Project would replace an existing surface parking lot with 247 parking spaces with a new 4.5-story parking structure with 750 parking spaces to serve the nearby AAA Headquarters. A detailed analysis of the consistency of the Project with the applicable goals of the Exposition/University Redevelopment Project Plan’s Fourth Amendment is presented in Table 3 of Appendix L to this IS/MND. The Project would promote increased foot traffic for the surrounding restaurant and retail businesses in the vicinity of the Project Site. The Project would help increase the greater Project economic area. Thus, the Project would conform to the applicable goals identified in the Exposition/University Park Redevelopment Plan.

North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District

The Project Site is located within the North University Park – Exposition Park – West Adams Neighborhood Stabilization Overlay (NSO) District, established by Ordinance No. 180,218, effective November 16, 2008. The main purpose of an NSO District is to protect and preserve the existing low density housing stock; to maintain and enhance the quality of life of area residents; to promote well-planned student housing; to establish regulations that address the negative impacts multi-habitable room projects

⁷⁵ *At the time the Redevelopment Plan and Amendments were prepared, the Redevelopment Project was referred to as the “Hoover Redevelopment Project.” Since then, the Redevelopment Project is now referred to as the “Exposition/University Park Redevelopment Project.”*

cause; to address inadequate parking; to prevent irreversible damage associated with oversized multi-habitable room projects and to help stabilize neighborhoods. The purpose of the NSO District is also to ensure that future projects are designed to be compatible with buildings that are adjacent or across the street.

The purpose of the North University Park – Exposition Park - West Adams NSO District is intended to: (A) promote well planned housing to meet the needs of a college/university student housing, and the needs of the community; (B) address impacts of multiple-habitable room projects which may be incompatible with surrounding development; (C) encourage well-planned neighborhoods with adequate parking and to individually review proposed large multiple-habitable room projects; (D) assure that the project provides adequate on-site parking; and (E) address a concentration of campus-serving housing in the vicinity. Since the Project is not a multi-family development, the Project would not hinder the goals of this NSO District.

South Central Los Angeles Alcohol Sales Specific Plan

The Project Site is located within the South Central Los Angeles Alcohol Sales Specific Plan (Specific Plan) area, established by Ordinance No. 171,681, effective September 13, 1997. The Specific Plan area is bounded by the Santa Monica Freeway (I-10) to the north, and the City boundaries to the east, west, and south. The City Council established the Specific Plan for conditional use approval for establishments dispensing for sale or other consideration alcohol beverages, including beer and wine, for off-site consumption. Since the Project would consist of a parking structure, a conditions use approval is not required. The South Central Los Angeles Alcohol Sales Specific Plan does not apply to the Project, and no further analysis is required.

Freeway Adjacent Advisory Notice (ZI-2427)

The Project Site is located approximately 900 feet west of the Harbor Freeway (I-110). The City Planning Commission (CPC) has taken an increased interest in projects classified as sensitive receptor sites, particularly schools and residential uses, in close proximity to freeways. ZI-2427 is an advisory notice informing planners and the public of the potential health risks associated with sensitive land uses that are within 1,000 feet of a freeway. Areas within 1,000 feet of freeways are known to experience the greatest concentrations of fine and ultrafine particular matter (PM) with greatest concentrations experienced within 500 feet of a freeway. Since the Project would consist of a parking structure, it would not be considered a sensitive land use to freeway emissions. Therefore, the Project would not be required to implement an enhanced filtration system, since most vehicle owners are not expected stay within the parking structure for

an extended period of time. As such, consistency with Freeway Adjacent Advisory Notice (ZI-2427) would not apply to the Project, and no further analysis is required.

Los Angeles Municipal Code

The Project Site is currently occupied by a surface parking lot with 247 parking spaces on an approximate 69,731 square-foot lot. Construction would involve replacing the surface parking lot with a 4.5-story parking structure, encompassing 202,200 square feet of area, with 750 vehicle parking spaces and 70 bicycle parking spaces. The Project Site is currently zoned RD1.5-1-O with a General Plan land use designation of Low Medium II Residential. The Project is requesting a zone change and height district change from RD1.5-1-O to C2-2-O, and a General Plan amendment to change the land use designation from Low Medium II Residential to Community Commercial. With approval of the requested entitlements, the proposed parking structure would be consistent with the allowable uses on-site.

Floor Area and Height

As stated previously, the Project is seeking a zone change and height district change from RD1.5-1-O to C2-2-O. With approval of a height district change, development in Height District No. 2 does not set a specific height limit for development in a C2 zone, but limits development to an FAR of 6:1. Since the Project would consist of only a parking structure, FAR limitations are not applicable to the Project. The proposed parking structure would be 4.5 stories above grade with rooftop parking. The parking structure is planned for a maximum height of 48 feet above grade at the top of the parapet. As such, the Project would not conflict with the allowable height and FAR pursuant to the LAMC.

Setbacks

Pursuant to LAMC Section 12.14(C), no front, side, or rear yard setbacks are required in the C2 Zone for commercial developments. As such, the Project would not be required to provide setbacks along any property line. Nevertheless, the Project would provide setbacks due to close proximity to residential buildings to the east, west, and south. The Project would include the following setbacks: a 25-foot front yard setback along the northern property line, a 12-foot side yard setback along the western property line, a 26-foot and 4-inch side yard setback along the eastern property line, and a 9-foot rear yard setback along the southern property line. As such, the Project would not conflict with setback requirements of the LAMC.

Open Space

The Project would include the construction of a 4.5-story parking structure. Thus, as a parking project, the Project is not required to provide open space. Nevertheless, the Project would include ground level landscaped areas. The Project would include approximately 19,181 square feet of open space, including 13,473 square feet of landscaped area.

Parking

The Project would increase the number of parking spaces for the existing AAA Headquarters building, located north of the Project Site at 2601 S. Figueroa Street. Vehicular access to the Project Site would be provided via one full-access driveway along W. 27th Street, on the northwest corner of the Project Site. A pedestrian crosswalk would be located through W. 27th Street to provide pedestrian access from the proposed parking structure and the AAA Headquarters building.

The Project would replace 247 surface parking spaces with 750 parking spaces, resulting in a net increase of 503 parking spaces. The parking structure would also include 70 total bicycle parking spaces: 35 long-term and 35 short-term bicycle spaces. Since the Project is an ancillary development to an existing building, the Project is not required to provide a specific number of vehicle or bicycle parking spaces, pursuant to the LAMC. The Project would not physically construct or add additional gross building area to the existing AAA building beyond what has already been approved by LADBS and constructed. Therefore, the Project would be consistent with parking space requirements of the LAMC.

As discussed in the preceding paragraphs, the Project would not conflict with local and regional plans applicable to the Project Site. With approval of discretionary requests and adherence to appropriate regulatory compliance measures, any impacts would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to land use would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. Development of any related project is expected to occur in accordance with adopted plans and regulations. It is also expected that most of the related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that the projects under consideration in the surrounding area would

implement and support local and regional planning goals and policies. The Project’s land use impacts would not be cumulatively considerable since the Project would not conflict with applicable local or regional plans. Therefore, the Project’s cumulative land use impacts would be less than significant without mitigation.

XII. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulatory Setting

Mineral resource sites within the City and County of Los Angeles have been classified by the State geologist as Mineral Resources Zone (MRZ), according to the known or inferred mineral potential of such sites. MRZ sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction.

City of Los Angeles General Plan Conservation Element

The Conservation Element of the General Plan consists of an identification and analysis of the existing natural resources in the City of Los Angeles. Policies of the Conservation Element include the preservation of mineral resources and of the access to these resources. Much of the area within the MRZ sites in Los Angeles was developed with structures prior to the MRZ classification and, therefore, is unavailable for extraction.

City of Los Angeles Municipal Code (LAMC)

Additionally, the Los Angeles Basin is known to be a source of petroleum. These areas are identified as an “O” (Oil Drilling) District. The 'O' Oil Drilling supplemental use district provisions of the LAMC (Section 13.01) were initially enacted in 1953. They delineate the boundaries within which surface operations for drilling, deepening, or operation of an oil well or related facilities are permitted, subject to conditions and requirements set forth in the code and by a Department of City Planning Zoning Administrator, the Fire Department, and City's petroleum administrator of the Office of Administrative and Research Services. The conditions protect surrounding neighborhoods and the environment from potential impacts, e.g., noise, hazard, spills, and visual blight. In addition, the Department of Water and Power monitors drilling operations to assure protection of water wells and aquifers. Property owners, including the City, receive oil production royalties from lands (e.g., city streets) that lie within oil drilling districts.

Project Impact Analysis

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the project development would convert an existing or future regionally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The determination of significance shall be made on a case-by-case basis considering: (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone (MRZ-2) Area or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or statewide significance, or is noted in the Conservation Element as being of local importance. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project Site is zoned RD1.5-1-O. The “O” designation indicates that the Project Site is located within an Oil-Drilling Supplemental Use District, particularly the Las Cienegas Oil Field. However, the Project Site is not currently used for the extraction of oil or mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the development would convert an existing or future regionally-important mineral extraction use to another use, or if the development would affect access to a site used or potentially available for regionally-important mineral resource extraction. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area.⁷⁶ As discussed above, the Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has been historically used for the extraction of mineral resources. Therefore, no impact associated with the loss of availability of a known mineral resource would occur.

Mitigation Measures

Project impacts with regard to mineral resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

No Impact. Development of the Project in combination with the related projects in the project vicinity would not result in the loss of availability of a known mineral resource or locally-important mineral resource recovery site. The analysis of cumulative impacts to mineral resources is generally site-specific. As such, the potential for cumulative impacts to occur is geographically limited. Based on the City's Environmental and Public Facilities Maps, the surrounding Project Site area is not located within a MRZ-2 Zone.⁷⁷ Therefore, cumulative development within the City would not have the potential to impact the availability of a locally important mineral resource. Therefore, cumulative development within the region would not result in the loss of availability of some mineral resources. The Project Site is not currently used for the extraction of mineral resources, and there is no evidence to suggest that the Project Site has historically been used for the extraction of mineral resources. The Project would not result in loss of, or loss of access to, a mineral resource. Therefore, the Project's contribution to the cumulative loss of available mineral resources or of a known mineral resource that would be of

⁷⁶ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas Containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

⁷⁷ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Areas containing Significant Mineral Deposits in the City of Los Angeles, September 1996.*

value to the region and/or the residents of the state would not be cumulatively considerable. As such, no impact would occur.

XIII. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulatory Setting

General Plan Noise Element

The Noise Element of the City’s General Plan establishes CNEL guidelines for land use compatibility and includes a number of goals, objectives, and policies for land use planning purposes. The overall purpose of the Noise Element of the City’s General Plan is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of citizens to excessive noise levels.

Los Angeles Municipal Code Noise Regulations

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that regulate new construction activities. The City’s comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria,

minimum presumed ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC are discussed below.

Section 111.01 and Section 111.03 of the LAMC define the ambient noise as the actual measured ambient noise level or the City’s presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes L_{eq} . The LAMC Noise Regulations state that where the ambient noise level is less than the presumed ambient noise level designated, the presumed ambient noise level shall be deemed to be the minimum ambient noise level.

In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people’s increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring five minutes or less in any one-hour period.⁷⁸ Section 112.01 of the LAMC prohibits noise from 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 or that 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 5 dBA.

Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the specific noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 A.M. and 10:00 P.M. when the source is located within 500 feet of a residential zone.

⁷⁸ LAMC, Chapter XI, Article I, Section 111.02-(b).

The noise limitations above do not apply where compliance is deemed to be technically infeasible. The term technically infeasible means 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. The aforementioned limitations apply only to uses in residential zones or within 500 feet thereof.

Section 41.40 of the LAMC prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday, and between 6 P.M. and 8 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Fundamentals of Noise

Sound is technically described in terms of amplitude (loudness) and frequency (pitch). The standard unit of sound amplitude measurement is the decibel (dB). The decibel scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound. A typical noise environment consists of a base of steady “background” noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise from, for example, traffic on a major highway.

Several rating scales have been developed to analyze the adverse effect of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise upon people is largely dependent upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

L_{eq} – An L_{eq} , or equivalent energy noise level, is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise

and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

L_{max} – The maximum instantaneous noise level experienced during a given period of time.

L_{min} – The minimum instantaneous noise level experienced during a given period of time.

CNEL – The Community Noise Equivalent Level is a 24-hour average L_{eq} with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24 hour L_{eq} would result in a measurement of 66.7 dBA CNEL.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day, night, or over a 24-hour period. For residential uses, environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60–70 dBA range, and high above 70 dBA. Noise levels greater than 85 dBA can cause temporary or permanent hearing loss. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet suburban residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate level noise environments are urban residential or semi-commercial areas (typically 55–60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60–75 dBA) or dense urban or industrial areas (65–80 dBA).

It is widely accepted that in the community noise environment the average healthy ear can barely perceive CNEL noise level changes of 3 dBA. CNEL changes from 3 to 5 dBA may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dBA CNEL increase is readily noticeable, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound.

According to the World Health Organization (WHO), sleep disturbance can occur when continuous indoor noise levels exceed 30 dBA or when intermittent interior noise levels reach 45 dBA, particularly if background noise is low. With a bedroom window slightly open (a reduction from outside to inside of 15 dB), the WHO criteria suggest that exterior continuous (ambient) nighttime noise levels should be 45 dBA or below, and short-term events should not generate noise in excess of 60 dBA. WHO also notes that maintaining noise levels within the recommended levels during the first part of the night

is believed to be effective for the ability of people to initially fall asleep. Other potential health effects of noise identified by WHO include decreased performance for complex cognitive tasks, such as reading, attention span, problem solving, and memorization; physiological effects such as hypertension and heart disease (after many years of constant exposure, often by workers, to high noise levels); and hearing impairment (again, generally after long-term occupational exposure, although shorter-term exposure to very high noise levels, for example, exposure several times a year to convert noise at 100 dBA, can also damage hearing). Finally, noise can cause annoyance and can trigger emotional reactions like anger, depression, and anxiety. WHO reports that, during daytime hours, few people are seriously annoyed by activities with noise levels below 55 dBA or moderately annoyed with noise levels below 50 dBA. Vehicle traffic and continuous sources of machinery and mechanical noise contribute to ambient noise levels. Short-term noise sources, such as truck backup beepers, the crashing of material being loaded or unloaded, car doors slamming, and engines revving outside a nightclub, contribute very little to 24-hour noise levels but are capable of causing sleep disturbance and severe annoyance. The importance of noise to receptors depends on both time and context. For example, long-term high noise levels from large traffic volumes can make conversation at a normal voice level difficult or impossible, while short-term peak noise levels, if they occur at night, can disturb sleep.⁷⁹

Noise levels from a particular source generally decline as distance to the receptor increases. Sound from a small localized source (approximating a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates or drops off at a rate of 6 dBA for each doubling of the distance. Other factors, such as the weather and reflecting or barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source, the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 and 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. In addition, noise levels are also generally reduced by 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures, such as hills, manmade features, buildings, and walls. Generally, for an at-grade facility in an average residential area where the first row of buildings covers at least 40 percent of total area, the reduction

⁷⁹ *City & County of San Francisco Superior Court, Mission Bay Alliance v. Office of Community Investment and Infrastructure, November 29, 2016.*

provided by the first row is reasonably assumed to be 3 dBA, with 1.5 dBA for each additional row. For buildings spaced tightly, the first row provides about 5dBA of reduction, successive rows reduced noise by 1.5 dBA per row, with a maximum reduction limit of 10 dBA.⁸⁰ Additional noise attenuation can be provided within residential structures. Depending on the quality of the original building façade, especially windows and doors, sound insulation treatments can improve the noise reduction by 5 to 20 dBA.⁸¹

Ambient Noise Levels

To assess the existing ambient noise conditions in the area, ambient noise measurements were taken on Thursday, February 13, 2020, with a Larson Davis 831 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2001) - American National Standard Specification for Sound Level Meters. Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map, depicts the noise measurement locations near the Project Site and fronting the nearby land uses as the most likely sensitive receptors to experience noise level increases during construction and at the major roadways surrounding the Project Site. The detailed noise monitoring data are presented in Appendix G, Noise Monitoring Data and Calculations Worksheets, and are summarized below in Table 4.8, Existing Ambient Daytime Noise Levels. As shown in Table 4.8, the ambient noise in the vicinity of the Project Site ranges from 53.3 to 56.4 L_{eq} . The maximum instantaneous noise level during the three 15-minute recordings was 73.4 dB L_{max} along the southern alleyway, where a refuse truck passed by the noise monitor. The primary noise sources that contributed most to the measured ambient noise levels was vehicle traffic during the daytime hours.

⁸⁰ California Department of Transportation, Division of Environmental Analysis, Technical Noise Supplement, November 2009.

⁸¹ Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment Manual, September 2018.

**Table 4.8
Existing Ambient Daytime Noise Levels**

ID	Location	Primary Noise Sources	Noise Level Statistics ^a		
			L _{eq}	L _{min}	L _{max}
A	On the Project Site, along the western property line	Cars parking, minimal vehicle traffic along W. 27 th Street	56.4	46.4	70.0
B	Along the southern alleyway, south of the Project Site	Refuse truck, light vehicle traffic	55.5	50.2	73.4
C	On the Project Site, along the eastern property line	Cars parking, minimal vehicle traffic along W. 27 th Street	53.3	45.9	64.6

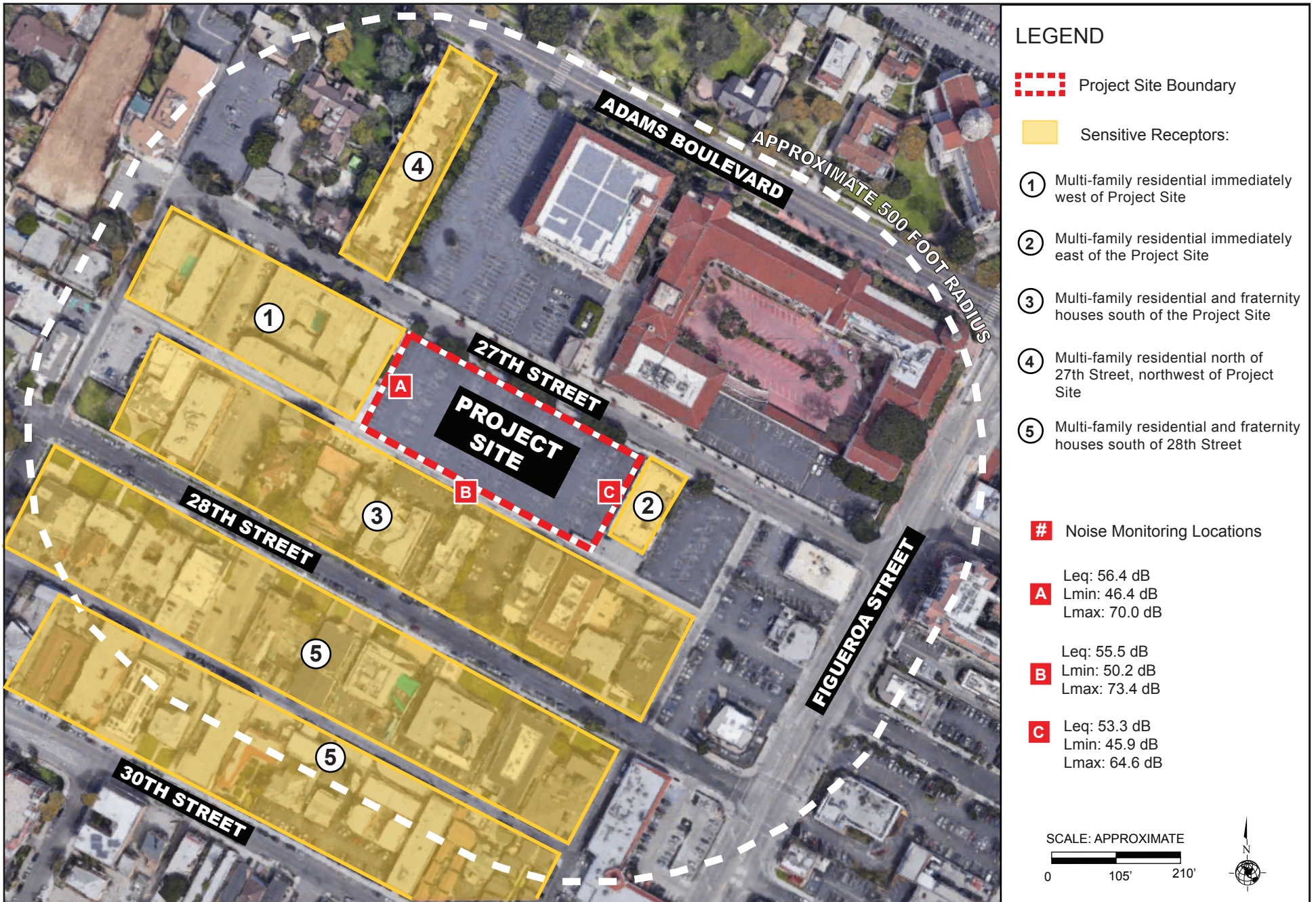
Notes:
^a Noise measurements were taken on Thursday, February 13, 2020 at each location for a duration of 15 minutes. See Appendix F of this IS/MND for noise monitoring data sheets.
Parker Environmental Consultants, 2020.

Sensitive Receptors

The surrounding land uses in the Project Site vicinity are generally fraternity houses and multi-residential land uses, which would be considered sensitive to noise. For purposes of assessing noise and groundborne vibration impacts on sensitive populations, the following sensitive receptors in close proximity (within 500 feet) to the Project Site were identified:

- 1) Multi-family residences immediately west of the Project Site (Nucap Apartments, 710 W. 39th Street);
- 2) Multi-family residences immediately east of the Project Site (Stardust Apartments, 634 W. 27th Street);
- 3) Multi-family residences and fraternity houses immediately south of the Project Site, across the alleyway (737-635 W. 27th Street);
- 4) Multi-family residences north of W. 27th Street, northwest of the Project Site (USC Annenberg House Apartments, 718 W. Adams Blvd.); and
- 5) Multi-family residences and fraternity houses south of W. 28th Street (724-626 W. 28th Street).

The location of these land uses relative to the Project Site is depicted in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.



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

Less Than Significant With Mitigation Incorporated. A significant impact may occur if the Project would generate excess noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles General Plan Noise Element (Noise Element) and the City of Los Angeles Noise Ordinance (Noise Ordinance).⁸² Implementation of the Project would result in an increase in ambient noise levels during both construction and operation, as discussed in further detail below. A significant impact may also occur if the Project were to result in a substantial temporary or periodic increase or a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project.

Construction-related noise impacts upon adjacent land uses would be significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 dBA at a distance of 50 feet from the noise source. However, the above noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction devices or techniques during the operation of the equipment. Further, as recommended by the L.A. CEQA Thresholds Guide, this analysis addresses whether construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly Leq) or more at a noise sensitive use.

For operational noise impacts, a project would normally have a substantial permanent increase in ambient noise levels from Project operations if the Project causes the ambient noise level measured at the property line of affected uses that are shown in Table 4.9, Community Noise Exposure Level (CNEL), to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase.

⁸² *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.*

**Table 4.9
Community Noise Exposure Levels (CNEL)**

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-family, Duplex, Mobile Homes	50 – 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 – 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 – 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 – 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 – 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 - 80	above 75	---

^a *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.

^b *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 systems or air conditioning will normally suffice.

^c *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.

^d *Clearly Unacceptable:* New construction or development should generally not be undertaken.

Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 (in coordination with the California Department of Health Services); City of Los Angeles, General Plan Noise Element, adopted February 1999.

Thus, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dBA CNEL at homes where the resulting noise level would be at least 70 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more is considered to cause a significant impact. Generally, in order to achieve a 3 dBA CNEL increase in ambient noise from traffic, the volume on any given roadway would need to double. In addition to analyzing potential impacts in terms of CNEL, the analysis also addresses increases in on-site noise sources per the provisions of the LAMC, which establishes a L_{eq} standard of 5 dBA over ambient conditions as constituting a LAMC violation.

Construction Noise

Construction of the Project would require the use of heavy equipment for site preparation (demolition of the asphalt covered surface parking lot), grading, building construction, architectural coating, and paving. During each construction phase there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of each activity. Table 4.10 identifies the representative noise levels for the types of construction equipment anticipated to be used for the Project,⁸³ including estimated usage factors found in the U.S. Department of Transportation, Federal Highway Administration, Roadway Construction Noise Model. The noise levels listed in Table 4.10, below, represent the A-weighted maximum sound level (L_{max}), measured at a distance of 50 feet from the construction equipment.

It should be noted that not all construction noise equipment would be utilized concurrently during each phase and the location and spacing of heavy construction equipment and machinery would vary over the course of construction. Mobile equipment moves around the construction site with power applied in cyclic fashion (bulldozers, loaders), or to and from the site (trucks). Because the precise numbers and locations of equipment operating at the same time are not known, this analysis follows the recommended procedures contained in the Federal Transit Administrations Transit Noise and Vibration Impact Assessment Manual for a quantitative construction noise assessment. Pursuant to these procedures the noise levels for the two loudest pieces of construction equipment were calculated from the center of the Project Site and the respective distance to each sensitive receptor.

⁸³ *Based on the construction equipment identified in the CalEEMod worksheets for the air quality and greenhouse gas emissions models presented in Appendices A and D to this MND.*

**Table 4.10
Noise Data for Selected Construction Equipment**

Construction Phases	Construction Equipment	Estimated Usage Factor %	Actual Measures Noise Level at 50 Feet (dBA L_{max})
Demolition/Clearing	Concrete/Industrial Saws (1)	20	90
	Rubber Tired Dozer (1)	40	82
	Tractor Loader/Backhoe (3)	40	78
Grading	Rubber Tired Dozer (1)	40	82
	Tractor Loader/Backhoe (1)	40	78
	Grader (1)	40	85
Building Construction	Generator Sets (1)	50	81
	Cranes (1)	16	81
	Forklifts (1)	20	75
	Tractor Loader/Backhoe (1)	40	78
	Welders (3)	40	74
Architectural Coating	Air Compressors (1)	40	78
Paving	Cement and Mortar Mixers (1)	40	79
	Pavers (1)	50	77
	Rollers (1)	20	80
	Tractor Loader/Backhoe (1)	40	78
	Paving Equipment (1)	50	77

Source: FHWA, Roadway Construction Noise Model. Construction Noise Prediction, (at Table 1 CA/T Equipment noise emissions and acoustical usage factors database, January 2006.

As shown in Table 4.11, Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation, the ambient exterior noise levels without mitigation would 60.5 dBA to 77.8 dBA. As such, unmitigated construction noise levels would exceed 75 dBA at a distance of 50 feet from the Project Site (in conflict with LAMC 112.05) and would exceed the more than 5-dBA threshold above ambient noise levels at Sensitive Receptors 1 through 4. As such, a substantial temporary or periodic increase in exterior ambient noise levels could occur for four of the five identified sensitive receptors. Therefore, the Project would incorporate mitigation measures N-1 to N-4 to further attenuate construction noise to the maximum extent feasible.

**Table 4.11
Estimated Exterior Construction Noise at Nearest Sensitive Receptors Without Mitigation**

ID	Ambient Noise (dBA Leq)	Demo	Noise Level Impact (dBA Leq) by Phase				Construction Noise Threshold (dBA Leq)	Noise Impact Above Threshold
			Grading	Building	Architectural Coating	Paving		
1	56.40	72.2	71.5	67.2	66.0	65.1	61.4	10.8
2	53.30	72.2	71.5	67.2	66.0	65.1	58.3	13.9
3	55.50	77.8	77.1	72.8	71.6	70.7	60.5	17.3
4	56.40	68.6	68.0	63.6	62.4	61.6	61.4	7.2
5	55.50	57.8	57.2	61.7	51.6	50.8	60.5	1.2

Notes:

1. ID refers to the sensitive receptor locations identified in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
 2. Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 3. An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 4. Construction noise thresholds are 5-dBA above ambient noise levels, pursuant to the L.A. CEQA Thresholds Guide.
 5. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.
- Source: Parker Environmental Consultants, LLC, (see Appendix F, Noise Monitoring Data and Calculation Worksheets).

As noted below, temporary noise barriers should be installed along the property lines to block the line-of-sight between the noise sources and surrounding sensitive receptors. The construction of a temporary ¾ inch plywood noise barrier would be capable of attenuating the noise level by approximately 20 dBA.⁸⁴ Additionally, noise control efforts to limit the construction activities to permissible hours of construction, incorporate noise shielding devices and sound mufflers, echo barriers, and operate machinery in a manner that reduces noise levels (i.e., not operating several pieces of equipment simultaneously if possible) would be effective in reducing noise impacts. Localized and portable sound enclosures would be used, as necessary, to significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10-20 dBA noise reduction or more if the barrier is doubled up (see Appendix F). Pursuant to LAMC Chapter IV, Article 1, Section 41.40, exterior demolition and construction activities that generate noise are prohibited

⁸⁴ California Department of Transportation, Technical Noise Supplement, pg. 6-5, November 2009.

between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday and federal holidays. Demolition and construction are prohibited on Sundays. The construction activities associated with the Project would comply with these LAMC requirements. Mitigation Measure N-1 would further restrict the permissible hours of construction to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday.

Further, the Applicant would be required to post informational signage providing contact information to report complaints regarding excessive noise (refer to Mitigation Measure N-5, below). Additionally, the Applicant would be required to provide courtesy notifications to adjacent business owners and residences a minimum of two weeks prior to commencement of construction (refer to Mitigation Measure N-6 below). The City of Los Angeles Building Regulations Ordinance No. 178,048 requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the Project Site, and City telephone numbers where violations can be reported. The notice is required to be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public. With implementation of Mitigation Measures N-5 and N-6 and regulatory compliance measures, affected residents and business owners would be provided advanced notice of potential noise impacts and opportunities to comment on construction noise.

Implementation of Mitigation Measures N-1 through N-4 would reduce the noise levels associated with construction of the Project to nearby residents to the maximum extent that is technically feasible. As noted in Table 4.12, Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Mitigation, estimated construction noise impacts would be substantially reduced to less than significance. Noise levels at each of the 5 receptors would be less than 75 dBA at a distance of 50 feet from the Site and would not be more than 5 dBA above ambient noise levels at any of the sensitive receptors. Thus, noise impacts would be less than significant with mitigation.

**Table 4.12
Estimated Exterior Construction Noise at Nearest Sensitive Receptors With Mitigation**

ID	Ambient Noise (dBA Leq)	Noise Level Impact (dBA Leq) by Phase					Construction Noise Threshold (dBA Leq)	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating	Paving		
1	56.40	53.1	51.5	47.2	46.0	45.1	61.4	0.0
2	53.30	53.1	51.5	47.2	46.0	45.1	58.3	0.0
3	55.50	58.7	57.1	52.8	51.6	50.7	60.5	0.0
4	56.40	49.6	48.0	43.6	42.4	41.6	61.4	0.0
5	55.50	48.7	47.2	42.8	41.6	40.8	60.5	0.0

Notes:

1. ID refers to the sensitive receptor locations identified in Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
 2. Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 3. An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 4. Construction noise thresholds are 5-dBA above ambient noise levels, pursuant to the L.A. CEQA Thresholds Guide.
 5. Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.
- Source: Parker Environmental Consultants, LLC, (see Appendix F, Noise Monitoring Data and Calculation Worksheets).

Operational Noise

Parking Structure Noise

The primary entrance to the parking garage would be provided from W. 27th Street at the northwest corner of the Project Site. The Project would provide 750 on-site parking spaces in a 4.5-story above-grade parking structure. Parking structures generate noise from vehicle engines, tires squealing, doors closing, car alarms, and people talking. Noise levels within the garage structure would fluctuate based on the types of simultaneous noise sources and the overall level of activity within the garage. Noise levels are anticipated to be highest during the A.M. and P.M. peak hours while employees are entering and exiting the Project Site. Since the Project Site is occupied by an existing surface parking lot, operational noise from the Project would be similar to the existing noise levels from people parking their vehicles. Additionally, the Project would be designed with perforated metal panels along each façade that would help attenuate any noise from the interior areas of the Project Site. The operation of the Project would be limited to the operational hours of the adjacent AAA Headquarters building.

Noise levels were quantified from the parking garage based on a conservative estimate of 750 cars parking per hour (see Appendix F to this IS/MND). The predicted noise levels from the parking garage for the highest peak hour were estimated using the recommended methodology for calculating parking structure noise as published by the FTA.⁸⁵ The parking garage noise levels were based on the northwest driveway entrance to the garage, which is the closest point of entry to the Sensitive Receptor No. 1. Table 4.13, shows the estimated vehicle noise levels from the parking garage entrance. As shown in Table 4.13, daytime noise levels within the lower level of the parking structure would be expected to range from 36.5 dBA Leq to 59.6 dBA Leq at the sensitive receptors. Thus, the estimated noise levels from the parking garage would not exceed the 5-dBA increase above ambient noise levels threshold at all five sensitive receptor locations. Therefore, noise from the parking garage would not significantly impact the surrounding residential neighborhoods during the late evening and early morning hours. As such, operational noise from the parking structure would be less than significant at nearby sensitive receptors without mitigation.

**Table 4.13
Estimated Noise Levels from Parking Garage**

Sensitive Receptor ^a	Distance from Parking Garage Entrance (ft)	Existing Ambient Noise Levels (dBA Leq)	Parking Garage Noise (dBA Leq)	Significance Threshold (dBA) ^b	Significant Impact?
1.	30	56.4	59.6	61.4	No
2.	375	53.6	37.6	58.3	No
3.	200	55.5	43.1	60.5	No
4.	130	56.4	46.9	61.4	No
5.	430	55.5	36.5	60.5	No

Notes:
^[a] See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.
^[b] The significance thresholds is defined by a 5 dBA or greater noise increase from the ambient noise level.
Source: Parker Environmental Consultants, calculation worksheets are provided in Appendix F to the IS/MND.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery

⁸⁵ U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Manual, September 2018.

equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level and is typically used for evaluating potential building damage. RMS is defined as the square root of the average of the squared amplitude of the level. RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.⁸⁶

Construction Vibration

Excavation and earthwork activities for the Project have the potential to generate low levels of groundborne vibration. The operation of construction equipment generates vibrations that propagate through the ground and diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels. Thus, construction activities associated with the Project could have an adverse impact on sensitive structures (i.e., building damage).

Table 4.14, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate at the Project Site during construction. As shown in Table 4.15, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source

⁸⁶ *Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment Manual, September 2018.*

activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

**Table 4.14
Vibration Source Levels for Construction Equipment**

Equipment	Approximate PPV (in/sec)					Approximate RMS (VdB)				
	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

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

Structural Damage Impacts

For purposes of addressing construction-related vibration impacts on buildings, the City has not adopted any policies or guidelines relative to groundborne vibration impacts. Consequently, the FTA and Caltrans adopted vibration standards for buildings which were used to evaluate potential impacts related to project construction. Based on Caltrans criteria, construction impacts relative to structural damage from groundborne vibration would be considered significant if the following thresholds were to occur as shown in Table 4.15, below.

**Table 4.15
Vibration Damage Potential Threshold Criteria**

Threshold Criteria	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Structure and Condition		
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.10
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.30
New residential structures	1.0	0.50
Modern industrial/commercial buildings	2.0	0.50

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, Chapter 7: Vibration Prediction and Screening Assessment for Construction Equipment, Table 19. September 2013.

The nearest off-site structures are the multi-family residential buildings located immediately to the east and west of the Project Site, which are considered older residential structures. However, both buildings include setbacks between the Project Site and the building facades. Sensitive Receptor #1, the Nucap Apartments observes a 10' – 5" setback from the Property line. The proposed parking structure would observe a 12 foot building setback from the western property line. Thus there would be 22' – 5" feet of separation between the project and the Nucap Apartment building. Sensitive Receptor #2, the Stardust Apartments observes a 5' – 10" setback from the Property line. The proposed parking structure would observe a 26' 4" foot building setback from the eastern property line. Thus, there would be 31' – 5" feet of separation between the project and the Stardust Apartment building. The Project would not include any subterranean parking levels, and therefore no grading or deep excavation activities would occur, which are generally associated with high levels of groundborne vibration. These proposed setbacks would provide proper groundborne vibration attenuation, since groundborne vibration is considered most hazardous to structures when construction activities would occur directly adjacent to a building façade and share a direct property line. Table 4.16, Proposed Project Estimated Vibration Levels During Construction, show the maximum vibration levels during construction. Based on the western setback distance of 22'-5" and eastern setback distance of 31'-5" and calculations provided by Caltrans' Transportation and Construction Vibration Guidance Manual (Sept 2013), the maximum vibration levels during construction are estimated to be 0.1 inches/second. As such, vibration source levels for equipment shown in Table 4.14, above, would not exceed the 0.30 in/sec threshold criteria for older residential structures. Therefore, the Project would not have the potential to exceed the groundborne vibration thresholds for structural damage.

Operational Vibration

The Project would include a parking structure development and would not involve the use of stationary equipment that would result in high vibration levels, which are more typical for large commercial and industrial projects. Additionally, the multi-level parking structure is designed to accommodate standard-sized automobiles and light duty trucks. No oversized vehicles capable of producing substantial groundborne vibration would occur on site. As such, vibration impacts associated with operation of the Project would be less than significant without mitigation.

**Table 4.16
Proposed Project Estimated Vibration Levels During Construction**

Sensitive Receptor ^a	Construction Equipment	Distance from Setback to Sensitive Receptor (ft)	PPV at 25 Feet (in/sec)	Maximum Vibration Levels (in/sec)	Significance Threshold (in/sec) ^b	Significant Impact?
1.	Large Bulldozer	22.4	0.089	0.10	0.3	No
	Caisson Drilling	22.4	0.089	0.10	0.3	No
	Loaded Trucks	22.4	0.076	0.09	0.3	No
	Jackhammer	22.4	0.035	0.04	0.3	No
	Small Bulldozer	22.4	0.003	0.00	0.3	No
2.	Large Bulldozer	31.4	0.089	0.07	0.3	No
	Caisson Drilling	31.4	0.089	0.07	0.3	No
	Loaded Trucks	31.4	0.076	0.06	0.3	No
	Jackhammer	31.4	0.035	0.03	0.3	No
	Small Bulldozer	31.4	0.003	0.00	0.3	No

Notes:

^[a] See Figure 4.2, Noise Monitoring and Sensitive Receptor Location Map.

^[b] The significance thresholds is defined by a 5 dBA or greater noise increase from the ambient noise level.

Source: Parker Environmental Consultants, calculation worksheets are provided in Appendix F to the IS/MND.

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 airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. A significant impact may occur if the Project were located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or in the vicinity of the Project Site. The closest airport to the Project Site is the Los Angeles International Airport, approximately 11 miles southwest of the Project Site. The Project Site is not located within an airport land use plan. Further, the Project Site does not fall within the jurisdiction of the Airport Land Use Commission (ALUC) and would not be subject to the land use compatibility standards of the Airport Land Use Plan.⁸⁷ The Project would not expose people to excessive noise levels associated with airport uses. Therefore, no impact would occur.

⁸⁷ Los Angeles County, Airports and Airport Influence Areas Map, August 2018.

Mitigation Measures:

Increased Noise Levels (Construction Activities)

- N-1** Construction and demolition shall be restricted to the hours of 7:00 AM to 6:00 PM Monday through Friday, and 8:00 AM to 6:00 PM on Saturday.
- N-2** The project contractor(s) shall employ state-of-the-art noise minimization strategies when using mechanized construction equipment. To the maximum extent practical, demolition and construction activities shall be scheduled and coordinated so as to avoid operating several pieces of equipment simultaneously, which cause high noise levels. Construction equipment shall not idle when not in use. The contractor shall place noise construction equipment as far from the Project Site edges as practicable.
- N-3** The project contractor shall use power construction equipment with noise shielding and muffling devices. The noise mufflers shall be consistent with manufacturers’ standards and be equipped with all construction equipment, fixed or mobile.
- N-4** The project contractor shall erect a temporary noise-attenuating sound barrier along the perimeter of the Project Site. The sound wall shall be a minimum of 8 feet in height to block the line-of-site of construction equipment and off site receptors at the ground level. The sound barrier shall include ¾ inch plywood or other sound absorbing material capable of achieving a 10-dBA reduction in sound level. Localized and portable sound enclosures shall be used to further significantly reduce noise from these types of equipment. Products such as Echo Barrier Outdoor noise barrier/absorbers can provide a 10-20 dBA noise reduction or more if the barrier is doubled up.
- N-5** An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive noise levels. Any reasonable complaints shall be rectified within 24 hours of their receipt.
- N-6** The Applicant shall provide a courtesy notice of the project’s construction related activities to adjacent business owners and residences a minimum of two weeks prior to commencement of construction.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with the related projects identified in Section 3, Project Description, would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City. While the Project's potential noise impacts are less than significant following mitigation, it is possible that a proximate related project's noise impacts, when coupled with the noise impacts of the Project, could result in a cumulatively significant noise impact.

With respect to cumulative construction noise and vibration impacts, there are no related projects within 500 feet of the Project Site. The closest related projects to the Project Site are Related Project No. 2, located approximately 665 feet west of the Project Site, and Related Project No. 5, located approximately 550 northwest of the Project Site (see Figure 3.15, Location of Related Projects, in Section 3. Project Description). Construction-period noise for the Proposed Project and each related project (that has not yet been built) would be localized. Each of the related projects would be required to comply with the City's noise ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require potentially significant impacts to be reduced to the maximum extent feasible. Thus, the cumulative impact associated with construction noise would be mitigated to less than significant levels, and the Proposed Project's incremental effects would not be cumulatively considerable. As such, no cumulative construction impacts would occur.

With respect to cumulative operational noise impacts, each of the related projects would be required to comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels. Nevertheless, the siting and development of related projects would be subject to further CEQA review and evaluated on a case-by-case basis. Thus, the cumulative impact associated with operational noise would be less than significant.

XIV. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Regulatory Setting

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

On September 3, 2020, SCAG’s Regional Council adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) - a plan that the Regional Council now calls Connect SoCal. Connect SoCal builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Based on the regional growth projections in Connect SoCal, the City had an estimated permanent population of approximately 3,933,800 persons and approximately 1,367,000 residences in 2016. By the year 2045, SCAG forecasts that the City will increase to 4,771,300 persons (or a 21% increase since the year 2016) and approximately 1,793,000 residences (or a 31% increase since the year 2016). SCAG’s population and housing projections for the City, Los Angeles County, and the SCAG region as a whole for 2016 and 2045 are further summarized in Table 4.17, below. Employment within the City is expected to grow by 287,600 jobs, which is an approximate 16 percent increase in employment between 2016 and 2045.

On a policy level, the Project is consistent with the goals and strategies of the RCP and the Compass Growth Vision Strategy discussed above, as the Project would revitalize a developed property in an existing commercial area. The Project is an infill development project within the South Los Angeles CPA within the City. With respect to regional growth forecasts, SCAG forecasts the City of Los Angeles Subregion will experience a

population increase to 4.7 million persons by 2040. As shown in Table 4.17, below, SCAG population and housing projections from 2016 through 2045 envisions a population growth of 837,500 additional persons (an approximate 21% growth rate) in the City of Los Angeles and 3,672,000 additional persons (an approximate 19% growth rate) in the entire SCAG Region. The number of households within the City of Los Angeles is anticipated to increase by 426,000 households, or approximately 31% between 2016 and 2045. The number of households within the SCAG Region is anticipated to increase by 1,621,000 households, or approximately 27% between 2016 and 2045. The number of employment opportunities is anticipated to increase by 287,600 jobs (approximately 16%) in the City of Los Angeles between 2016 and 2045, and the SCAG Region is anticipated to increase by 1,660,000 jobs (approximately 20%) between 2016 and 2045.

**Table 4.17
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County, and the SCAG Region**

Population			
Region	2016	2045	%Growth (2016-2045)
Los Angeles City	3,933,800	4,771,300	21%
Los Angeles County	10,110,000	11,674,000	15%
SCAG Region	18,832,000	22,504,000	19%
Households			
Region	2016	2045	%Growth (2016-2045)
Los Angeles City	1,367,000	1,793,000	31%
Los Angeles County	3,319,000	4,119,000	24%
SCAG Region	6,012,000	7,633,000	27%
Employment			
Region	2016	2045	%Growth (2016-2045)
Los Angeles City	1,848,300	2,135,900	16%
Los Angeles County	4,743,000	5,382,000	13%
SCAG Region	8,389,000	10,049,000	20%
<i>Source: SCAG, Connect SoCal, Demographics and Growth Forecast Appendix, Table 13 – County Forecast of Population, Households, and Employment and Table 14 – Jurisdiction-Level Growth Forecast, adopted September 3, 2020.</i>			

Project Impact Analysis

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. A significant impact may occur if the Project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. The determination of whether the project results in a significant impact on population and housing growth shall be made considering: (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the project.⁸⁸

Construction Growth

While construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be generated during construction of the Project, which could induce substantial population growth.

Operational Growth

The Project would include the site clearing of a surface parking lot for the construction of a parking structure with 750 parking spaces that would serve the nearby existing AAA Headquarters building. The Project would not involve the construction of any residential units. Therefore, the Project would not result in a direct increase of housing or population growth.

Given the large workforce available in the Project vicinity and greater urban area, it is anticipated that most of the jobs generated by the Project would be filled by employees who already reside within the City or County. Therefore, as the Project would not directly contribute to population growth in the vicinity of the Project Site and most of the jobs and employees generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project's employees who may relocate to the surrounding area would not be substantial. As

⁸⁸ *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.*

such, although the Project may result in indirect population growth with new persons relocating to the City, any such indirect population growth would be well within SCAG's population growth projections. Therefore, the minimal addition of employees would be accounted for and consistent with the SCAG forecasts for the year 2045.

As discussed above, because most of the jobs and employees generated by the Project would already reside within the City or County and some would be filled by persons moving into the surrounding area but would be accommodated in existing vacant housing and the new units in the related projects and nearby developments, the potential indirect increase in population caused by the Project would be minimal and consistent with SCAG's population forecasts for the City of Los Angeles for the year 2045. As such, the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout that would result in an adverse physical change in the environment or introduce unplanned infrastructure that was not previously evaluated. Therefore, the Project's population and housing impacts would be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project would consist of an existing parking lot, and would include the construction of a new above-grade parking structure. No displacement of existing housing would occur with the Project. Thus, no impact would occur.

Mitigation Measures

Project impacts with regard to population and housing would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The related projects would introduce additional jobs and employment opportunities to the Project Site area. New employment from related projects could also result in population growth if new employees move to the area, resulting in direct and indirect population growth in the Project Site area.

As discussed in response to Checklist Question XIV(a), the Project would not exceed the employment growth projections of SCAG's Connect SoCal for the City of Los Angeles subregion. Because the Project would not displace any residents, and population growth potentially associated with the Project has already been anticipated

per SCAG projections, the Project’s population growth would not be cumulatively considerable. Therefore, the Project’s cumulative impacts to population and housing would be less than significant.

With respect to population growth from permanent employment, jobs in institutional land uses typically do not generate substantial population growth within the region. As such, jobs are generally filled by residents that already reside within close proximity to those jobs. Further, residential neighborhoods would be supportive and complementary to the proposed institutional land uses. As such, the related projects would not generate substantial indirect population growth or demand for new housing, and a less than significant impact would occur.

XV. Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Fire

The LAMC includes provisions for new construction projects within the City. LAMC Section 57.118 establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects. Under Section 57.4705.1.6, there must be at least one elevator which shall be available for fire EMS and designed so that key

switches located in the building control station/fire command center will recall elevator(s) to the designated main floors.

The Fire Code, as it pertains to the Project, specifies standards for development to ensure that adequate fire service features, such as response distance, emergency access, and fire flow, are maintained. The Fire Code specifies the maximum response distance allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements.

Police

The City Charter, Administrative Code, and LAMC identify law enforcement regulations and the powers and duties of the LAPD. City Charter Article V, Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

Section 22.240 of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City’s Fire, Building, and Health Codes.

Schools

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project’s impacts on school facilities. Pursuant to SB 50, LAUSD collects developer fees for new construction within its boundaries.

Parks

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505 to mitigate the park- and open space-related impacts of new residential development

projects. The Parks Dedication and Fee Update Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. Since the Project consists of a parking structure development and does not include any residential component, the City's Quimby and Parkland Fees are not applicable to the Project.

Libraries

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) was adopted by the Board of Library Commissioners in 1988 and revised in 2007. The Facilities Plan guides the construction, maintenance and organization of public branch libraries.

Project Impact Analysis

a) Fire Protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.⁸⁹

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between commercial land uses and a LAFD fire station that houses an engine company or truck company is one mile or 1.5 miles, respectively. If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such

⁸⁹ *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

Construction

Construction of the Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of BMPs for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Project. The BMPs that would be implemented during construction of the Project would include keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. However, these impacts are considered to be less than significant because emergency access would be maintained to the Project Site and surrounding vicinity during construction through marked emergency access points approved by the LAFD. Construction impacts are temporary in nature and do not cause lasting effects, and no complete lane closures are anticipated. Additionally, if any partial street closures are required, flag persons would be used to facilitate the traffic flow until construction is complete. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Construction of the Project would result in a less than significant impact without mitigation.

Operation

A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service that would result in a physical adverse impact upon the environment.

As indicated above, the LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed or if structures located in the applicable commercial area install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the Project is located beyond the maximum response distance. Although the

Project is within the adequate response distance, the Project would install a fire sprinkler system to ensure safety from any fire hazards that may occur within the building.

The Project would replace a surface parking lot with an above-grade parking structure with a net increase of 503 parking spaces to serve the existing AAA Headquarters located directly across W. 27th Street. The Project would increase the utilization of the Project Site by enhancing and adding additional parking spaces. The Project would potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 15, located at 3000 Hoover Street, which is approximately 0.5 mile (driving distance) west of the Project Site. Based on the response distance criteria specified in LAMC 57.09.07A and the relatively short distance from Fire Station No. 15 to the Project Site, fire protection response would be considered adequate without mitigation.

Furthermore, the adequacy of existing water pressure and water availability in the area of the Project would be verified by the LAFD during the plan check review process. Compliance with the Los Angeles Building Code and LAFD standards is mandatory and routinely conditioned upon projects when they are approved. Further, the Project would work with LAFD and incorporate LAFD’s recommendations relative to fire safety into the building plans. As part of the Project, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety, including installation of fire sprinklers, would ensure that any impacts upon fire services created by the Project would be less than significant.

b) Police Protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station that would result in a physical adverse impact upon the environment. A “significant effect on the environment” is defined as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the

physical change is significant.”⁹⁰ Thus, the addition of a new police station or police substation, if warranted, would only be considered significant if such activities result in a physical adverse impact upon the environment.⁹¹

The Project Site is located in the Southwest Division of the LAPD’s South Bureau. The Southwest Community Police Station located at 1546 W. Martine Luther King Jr. Boulevard, serves the Project Site and is approximately 2.6 miles southwest at 10 minutes from the Project Site. Within the Southwest Division Area, the Project is located within Reporting District (RD) 328.⁹² The Southwest Division has approximately 352 sworn personnel and 32 civilian support staff. The Southwest Division is a culturally diverse community with a residential population of over 165,000 people. The officer to resident ratio is 1 officer to every 469 residents.⁹³ According to the LAPD/s Computer Statistics (CompStats) Division, the average police response time to emergency, high priority calls in the Southwest area was 3.9 minutes. The medium high priority response time was 11.1 minutes, and the low priority, non-emergency response time is 25.5 minutes. These response times were taken from the statistics submitted by Southwest Division for December 29, 2019 through January 25, 2020. Table 4.18, Southwest Area Crime Statistics, provides crime statistics for local Project Site area in the City.

Construction

Construction sites, if left unsecured, have the potential to attract trespassers and/or vandals that would potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Such occurrences would adversely affect the aesthetic character of the Project Site and surrounding area and could potentially cause public health and safety concerns. As part of the standard condition of approval issued by the Department of Building and Safety, the Applicant will be required to ensure the construction site is secure and does not pose a nuisance to pedestrians or adjacent property owners during construction. Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area. As such, with adherence to regulations and project

⁹⁰ *State CEQA Guidelines, Section 15382.*

⁹¹ *City of Hayward et al. v. Board of Trustees of the California State University (2015).*

⁹² *Los Angeles Police Department, Correspondence Report for The AAA Parking Structure Project, February 2, 2020 (Appendix K to this IS/MND).*

⁹³ *LAPD, Correspondence Report for The AAA Parking Structure Project, February 2, 2020 (Appendix K to this IS/MND).*

**Table 4.18
Southwest Area Crime Statistics**

Crimes	2019	2018	2017
Violent Crime	2,096	2,400	2,415
Property Crime	5,371	6,086	5,975
Homicide	15	25	20
Rape	112	139	130
Robbery	712	876	875
Aggravated Assault	1,257	1,360	1,390
Burglary	560	757	858
Motor Vehicle Theft	782	889	1,027
BTFV	1,614	1,770	1,568
Personal / Other Theft	2,415	2,670	2,522
Simple Assault	2,701	2,647	2,667
<i>Notes:</i>			
<i>^a Crime Statistics for year ending December 31, 2019.</i>			
<i>Source: LAPD, Correspondence Report for The AAA Parking Structure Project, February 2, 2020 (Appendix I.2 to this IS/MND).</i>			

conditions, Project impacts would be less than significant during the construction period without mitigation.

Operation

The Project would replace a surface parking lot with an above-grade parking structure with a net increase of 503 parking spaces and 70 bicycle spaces to serve the existing AAA Headquarters located directly across W. 27th Street. The Project would satisfy the parking demand for the AAA Headquarters employees using other AAA and/or public parking lots, as well as reduce potential spillover into the adjacent neighborhoods. The Project would replace the existing 247-space surface parking lot currently on-site that serves the AAA Headquarters employees. It is not anticipated that the Project would increase the demands upon police services due to an increase in on-site population because the Proposed Project would serve as a consolidated parking facility to accommodate the employee demand of the AAA Headquarters and would reduce the reliance on other off-site AAA surface parking lots and public parking facilities in the immediate area. As discussed in Section 17, Transportation, the Project would serve to reduce vehicle circulation on the adjacent arterial streets currently experienced by AAA Headquarters employees by providing a centralized parking structure. The Project would also reduce the walking distance between the off-site parking facilities and the AAA Headquarters that employees currently travel. A marked pedestrian crossing would be provided between the parking facility and the AAA Headquarters to provide a convenient connection for employees. The Project would also improve the Project

frontage by providing street trees and sidewalks to meet City standards, thus, enhancing the pedestrian environment and experience.

Upon completion of the Project, the Applicant shall provide the Commanding Officer of Southwest Division’s Community Police station with a diagram copy of each portion of the Project plans. The diagram would include access routes and any additional information that might facilitate police response. The Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting. These preventative and proactive security measures would decrease the number of service calls to the LAPD. With incorporation of the security design features, the Project’s potential impact upon LAPD services would be reduced to a less than significant level without mitigation.

c) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD). The Project Site is located in LAUSD Board Districts 1 and 2. The Project Site is currently served by one elementary school, one middle school, and one high school. Table 4.19, Resident Schools Serving the Project Site, details the names, grades served, and location of each school.

**Table 4.19
Resident Schools Serving the Project Site**

School Name	Grades	Address
Norwood Street Elementary	K-5	2020 Oak Street
John Adams Middle School	6-8	151 W. 30 th Street
Manual Arts Senior High School	9-12	4131 S. Vermont Street
<i>Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed December 2019.</i>		

Since the Project’s parking structure would serve the existing uses of the AAA Headquarters building, the Project would not directly generate students and local demands on schools from potential employees. As such, demands on local schools would be minimal. Nevertheless, the Project Applicant would be required to pay all applicable developer fees to the LAUSD to offset the Project’s demands upon local schools. Prior to issuance of a building permit, the General Manager of the City, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California

Government Code Section 65995. Pursuant to Government Code Section 65995, payment of development fees authorized by SB 50 are deemed “full and complete school facilities mitigation.” With the payment of these school development fees, the Project’s potential impact upon public school services would be less than significant.

d) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the Project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.⁹⁴

Parks and recreation facilities within a two-mile radius of the Project Site include: Orthopedic Hospital, St. James Park, Hoover Recreational Center, Toberman Recreation Center, Exposition Center/Rose Garden, Trinity Recreation Center, Pico Union Vest Pocket Park, Richardson Family Park, Alvarado Terrace Park, Roy A. Anderson Recreation Center, LA84 Foundation/John C. Argue Swim Stadium, Ahmanson Senior Citizen Center, Loren Miller Recreation Center, Curtis Roland Park, West Adams Heights Park, Betty Hill Senior Citizen Center, Denker Recreation Center, Gilbert W. Lindsay Recreation Center/Skate Park, Central Park Recreation Center/Pool, Normandie Recreation Center, Hope and Peace Park, Orchard Avenue park, Central Avenue Pocket Park, Martin Luther King Jr. Park/Recreation Center, and Julian C. Dixon Park.

A significant impact generally occurs if a project includes substantial population growth through residential development that could generate an increased demand in recreational and park facilities. The Project includes the development of a parking structure. The Project would not result in direct population growth since the Project does not propose any residential uses. As such, the Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. The Project is expected to increase the number of visitors, employees, and vendors to the Project Site. Any increase in recreation and park facilities use would be minimal, resulting in a less than significant impact without mitigation.

⁹⁴ *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006.*

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site. The determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project’s proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library).

Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides library services at the Central Library, seven regional branch libraries, 56 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection. The LAPL branches currently serving the Project Site include:

- 1. Pico Union Branch Library, located at 1030 S. Alvarado Street, approximately 1.6 miles north of the Project Site; and
- 2. Exposition Park – Dr. Mary McLeod Bethune Regional Library, approximately 1.9 miles southwest of the Project Site.

The Project would serve as a consolidated parking facility to accommodate the employee demand of the AAA Headquarters and would reduce the reliance on other off-site AAA surface parking lots and public parking facilities. As such, the Project would not substantially increase the presence of visitors and employees in the Project area. Persons accessing the Project Site would already be in the area and would be employees and visitors of the existing AAA Headquarters building. Any increases in the use of library facilities caused by the Project are expected to be minimal, since residents usually utilize local libraries. Moreover, the Central Library and branch libraries currently meet the library demands of the community and are anticipated to be able to meet the Project’s demand for library services. The LAPL is committed to increase the number of people who use the library services and to increase the number of library card holders and actively promote and robustly market programs and services to increase residents’ overall engagement with the libraries. Therefore, the Project’s impacts upon library services would be less than significant without mitigation.

Mitigation Measures

Project impacts with regard to fire protection services, police protection services, schools, parks, and libraries would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant. Development of the residential related projects is projected to generate additional housing and resident population within the study area, which would likely generate additional demands upon fire protection services, police protection services, schools, parks, and library services. As part of the City's annual budget review process, the City assesses the needs for public services and allocates funds via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. The cumulative impacts upon each of the service providers is addressed below.

Fire

With respect to fire services, the Project, in combination with the related projects, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate fire protection services is the responsibility of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis,

including a specific location, would be speculative and beyond the scope of this document. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant without mitigation.

Police

With respect to police services, the Project, in combination with the related projects, would increase the demand for police protection services in the Project Site area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. To help reduce any on-site increase in demand for police services, the Project and related projects would implement comprehensive safety and design features to enhance public safety and reduce the demand for police services. In addition, the Project, as well as the related projects, would generate revenues to the City's Municipal Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate. Furthermore, in accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant without mitigation.

Consistent with *City of Hayward v. Board Trustees of California State University (2015) 242 Cal.App.4th 833* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) the obligation to provide adequate police services is the responsibility of the City. LAPD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document.

Schools

With respect to cumulative impacts upon schools, the Project, in combination with related projects is expected to result in a cumulative increase in the demand for school services within the LAUSD service area. Development of the related projects would likely generate additional demands upon school services. These related projects would have the potential to generate students that would also attend the Project's assigned schools. However, each of the related projects' new developments would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Therefore, cumulative impacts on schools would be less than significant without mitigation.

Parks

With respect to cumulative impacts upon parks, development of the Project in conjunction with related projects could result in an increase in demands upon parks in the area of the Project Site. However, as an ancillary parking structure to an office building, the Project is expected to contribute very little demand upon daytime park use. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of Parks and Recreation Fees. Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant without mitigation.

Libraries

With respect to cumulative impacts upon library services, the Project includes the development of a new parking structure and, thus, would not directly increase residential population in the area since the Project is not proposing any residential units. Development of the residential related projects is projected to generate additional housing and residents within the study area, which would likely generate additional demands upon library services. This increase in resident population would result in a cumulative increase in demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for \$178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020 Strategic Plan, much of this growth has already been

accounted for in planning new and expanded library facilities. Thus, the potential increase in library use generated by the Project would not make a cumulatively considerable impact upon the City’s library system. Therefore, the cumulative impacts related to library facilities would be considered less than significant without mitigation.

XVI. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505 to mitigate the park- and open space-related impacts of new residential development projects. The Parks Dedication and Fee Update Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. Since the Project consists of a parking structure development and does not include any residential component, the City’s Quimby and Parkland Fees are not applicable to the Project.

Project Impact Analysis

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

Less Than Significant Impact. A significant impact may occur if the project would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. The determination of whether the project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from a project; and (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available.

As discussed above, the Project proposes an above-grade parking structure and, thus, would not be adding any new residences to the area. The Project would not directly contribute to population growth in the area and would provide on-site open space and landscaping for the proposed parking uses. Any incremental need for open space as a result of the Project would be expected to be met by the Project’s proposed landscaping and open space areas. As such, the Project would not be expected to increase demand on the surrounding area and surrounding recreation and park facilities. Any increase in recreation and park facilities use would be minimal, and a less than significant impact would occur without mitigation.

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact. A significant impact may occur if a project includes or requires the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. As noted above, the Project does not include a residential component and would not directly result in the increase of residential population in the area. Any new residential construction would be subject to CEQA review on a case-by-case basis. As such, the Project would not result in a substantial increase in use of recreational and park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur without mitigation.

Mitigation Measures

Project impacts with regard to recreation would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

Less Than Significant Impact. The Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City. The related projects that include a residential component would be required to provide on-site open space and pay the Dwelling Unit Construction Tax or Quimby fees to improve recreation and park facilities in the area and to mitigate their impacts upon park and recreational facilities. Additionally, each related project would be subject to the provisions of the LAMC for providing on-site open space, which is proportionately based on the amount of new development. Because the Project would have a less than significant incremental contribution to the potential cumulative impact on recreational resources, the Project would have a less than significant cumulative impact on such resources.

XVII. Transportation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The following section summarizes and incorporates by reference the information provided in the Site Access and Circulation Evaluation for the Automobile Club of

Southern California, Parking Structure Project, Los Angeles, California, prepared by Gibson Transportation Consulting, Inc., dated June 2, 2020 and the LADOT Inter-Departmental Correspondence Letter, dated August 5, 2020. The Site Access and Circulation Evaluation and LADOT Letter are provided as Appendix G to this IS/MND.

Regulatory Setting

On July 30, 2019, the City of Los Angeles adopted the CEQA Transportation Analysis Update, which sets forth the revised thresholds of significance for evaluating transportation impacts as well as screening and evaluation criteria for determining impacts. The CEQA Transportation Analysis Update establishes VMT as the City's formal method of evaluating a project's transportation impacts. In conjunction with this update, LADOT adopted its TAG (July 2019), which defines the methodology for analyzing a project's transportation impacts in accordance with SB 743.

Project Impact Analysis

(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project would conflict with a program plan, ordinance, or policy designed to maintain adequate effectiveness of an overall circulation system, including transit, roadway, bicycle and pedestrian facilities. In accordance with the City's TAG, a project that generally conforms with, and does not obstruct the City's development policies and standards will generally be considered to be consistent. Table 4.20, below, provides responses to the list of policy related questions, as recommended by LADOT, in order to help determine whether the Proposed Project conflicts with the City's circulation system policies. As indicated in Table 4.20, the Project is in conformance with the applicable policies and programs corresponding to the Project and would not preclude the City's implementation of any adopted policy and/or program. Therefore, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and impacts would be less than significant without mitigation.

Table 4.20
Questions to Determine Project Applicability to Plans, Policies and Programs

#	Guiding Questions	Response
Existing Plan Applicability		
1	Does the Project include additions or a new construction along a street designated as a Boulevard I, and II, and/or Avenue I, II, or III on property zoned R3 or less restrictive zone? (screening question)	No Conflict. The Project Site fronts W. 27 th Street. Per the Mobility Element 2035, 27 th Street is a Local Street. The Project Site is zoned RD1.5-1-O with a General Plan land use designation of Low Medium II Residential. Thus, the Project would not conflict with the Mobility Plan 2035 street designations.
2	Is the Project Site along any network identified in the City's Mobility Plan?	No Conflict. W. 27 th Street is not identified as a in the the Transit Enhanced Network map, the Bicycle Lane Network Map, and the Pedestrian Enhanced District Map in the Mobility Plan 2035. However, Figueroa Street is identified as a Comprehensive Transit Enhanced Street and a Tier 1 Protected Bicycle Lane. The Project Site is located in an area with well-developed pedestrian facilities, including sidewalks on all streets and crosswalks at all intersections. As such, the Project would not conflict with any of the network programs or policies of the Mobility Plan 2035.
3	Are dedications or improvements needed to serve long-term mobility needs identified in the Mobility Plan 2035?	No Conflict. No roadway widening or dedications are required to accommodate the Mobility Plan's roadway requirements for W. 27 th Street adjacent to the Project. Thus, the Project would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
4	Does the Project require placement of transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program?	No Conflict. The Project does not require placement of additional transit furniture in accordance with the City's Coordinated Street Furniture and Bus Bench Program since the Project would not result in an increase in trips and is not abutting a transit stop. As such, no conflict would occur.
5	Is the Project Site in an Identified Transit Oriented Community?	No Conflict. The Project would consist of a parking structure and no residential units. Thus, the Transit Oriented Community guidelines would not apply to the Project. As such, the Project would not conflict with policies associated with TOC areas.
6	Is the Project Site on a roadway identified in the City's High Injury Network?	No Conflict. The Project Site is not identified in the City's High Injury Network along W. 27 th Street. As such, no conflict would occur.
7	Does the Project propose repurposing existing curb space? (Bike corral, car-sharing, parklet, electric vehicle charging, loading zone, curb extension, etc.)	No Conflict. The Project would eliminate three vehicle driveways along W. 27 th Street and would include a primary driveway along W. 27 th Street. Short-term bicycle parking would be provided on the sidewalk fronting W. 27 th Street. These improvements would be implemented in coordination with LADOT, and thus would not conflict with long-term mobility needs identified in the Mobility Plan 2035.
8	Does the Project propose narrowing or shifting existing sidewalk placement?	No Conflict. The Project would not narrow any existing sidewalks nor shift existing sidewalk placement. The Project would include a 25-foot sidewalk along W. 27 th Street, adjacent to the Project Site. These sidewalks would be implemented in coordination with LADOT and thus

		would not conflict with pedestrian safety.
9	Does the Project propose paving, narrowing, shifting or removing an existing parkway?	No Conflict. The Project does not proposed modification of an existing parkway.
10	Does the Project propose modifying, removing, or otherwise affect existing bicycle infrastructure (ex: driveway proposed along street with bicycle facility)	No Conflict. The Project will not modify, remove, or otherwise affect existing bicycle infrastructure.
11	Is the Project Site adjacent to an alley? If yes, will the Project make use of, modify, or restrict alley access?	No Conflict. The Project Site is adjacent to an alleyway, which borders the Project Site to the south. This alleyway currently provides direct access from to other –off-site properties not including the Project Site. Vehicular access to the Project’s parking entrance would be provided from W. 27 th Street. Therefore, the Project would not modify, or restrict alley access. The Project does not propose to modify, or restrict alley access. As such, no conflict would occur.
12	Does the Project create a cul-de-sac or is the Project Site adjacent to an existing cul-de-sac? If yes, is the cul-de-sac consistent with design goal in Mobility Plan 2035 (maintain through bicycle and pedestrian access)?	No Conflict. The Project Site is not located adjacent to a cul-de-sac. As such, there would be no conflict with the Mobility Plan 2035.
Access: Driveways and Loading		
13	Does the Project Site introduce a new driveway or loading access along an arterial (Avenue or Boulevard)?	No Conflict. The Project Site is adjacent to a classified Local Street. Therefore, the Project would not introduce a new driveway or loading access along a major arterial and would not be in conflict with long-term mobility needs identified in the Mobility Plan 2035.
14	If yes to 13, Is a non-arterial frontage or alley access available to serve the driveway or loading access needs?	No Conflict. The Project would not introduce any new driveways along an arterial.
15	Does the Project Site include a corner lot? (avoid driveways too close to intersections)	No Conflict. The Project Site is bound by W. 27 th Street to the north, multi-family residential to the east and west, and an alleyway to the south. Thus, the Project Site is not located on a corner lot. As such, no conflict would occur.
16	Does the Project propose driveway width in excess of City standard?	No Conflict. The LADOT’s Manual of Policies and Procedures, Section 321, does not provide a recommended width for driveways for parking structure projects. Nevertheless, the Project’s site access and internal circulation plan would be designed in accordance with LADOT standards outlined in Section 321 of Manual of Policies and Procedures. The Project’s driveway width is approximately 20 feet wide. The Project would ensure safe internal circulation, with approval from LADOT.
17	Does the Project propose more driveways than required by City maximum standard?	No Conflict. The Project proposes one two-way driveway along W. 27 th Street, which is compliant with LADOT’s Manual of Policies and Procedures, Section 321.
18	Are loading zones proposed as part	No Conflict. The Project does not propose any loading

	of the Project?	zones. As such, the Project would not be in conflict with City policies that recommend loading be located away from arterial streets.
19	Does the Project include “drop-off” zones or areas? If yes, are such areas located to the side or rear of the building?	No Conflict. The Project does not propose any drop-off zones or areas.
20	Does the Project propose modifying, limiting/restricting, or removing public access to a public right-of-way (e.g., vacating public right-of-way)?	No Conflict. The Project does not propose to modify, limit or remove public access to public right-of-way.

Source: Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, Table 2.1-2: Questions to Determine Project Applicability to Plans, Policies, and Programs, July 2019.

Construction Impacts

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. 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. Refer to Mitigation Measure MM-TR-1, below. The implementation of the Mitigation Measure MM-TR-1 would mitigate any traffic impacts from construction to less than significant.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. A significant impact would occur if the Project conflicts with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

As discussed in the Site Access and Circulation Evaluation, prepared by Gibson Transportation and Consulting, Inc., a transportation study is not required for “any project only installing a parking lot or parking structure,” pursuant to the Los Angeles Department of Transportation (LADOT) Referral Form and the LADOT Inter-Departmental Correspondence Letter (August 2020). Further, trip generation is based on the size and type of land use included in a development and is independent from parking supply. Thus, the Project itself would not generate new trips or vehicle miles traveled (VMT) to the area. Therefore, based on the screening criteria identified in Section 2.2.2 of the TAG, the Project would result in less than significant impacts without mitigation.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. A significant impact may occur if the Project includes new roadway design or introduces a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project site access or other features were designed in such a way as to create hazard conditions.

Access to the Project Site would be provided via one full access driveway along W. 27th Street that would accommodate both left and right-turn ingress and egress maneuvers. Access to the Project Site would be concentrated to a single driveway, which would utilize the existing curb cut at the northwestern corner of the Project Site. The remaining curb cuts that currently serve the existing surface parking lot would be removed with development of the Project, thus minimizing interference to pedestrian flow and improving pedestrian safety along the adjacent sidewalk. In addition, a separate pedestrian access point would be placed adjacent to a proposed marked pedestrian crosswalk across W. 27th Street that would provide employees with a convenient connection between the Project Site and the AAA Headquarters building. The pedestrian crosswalk would be designed with American with Disabilities Act accessible ramps at both ends.

W. 27th Street is a designated Local Street in *Mobility Plan 2035, An Element of the General Plan* (LADCP, January 2016) (Mobility Plan) that provides access to nearby residential developments along the approximate 0.25-mile street segment. The placement of the Project driveway along W. 27th Street is consistent with the site access guidance in TAG, which recommends driveways be placed along low-volume local streets rather than an arterial street to minimize potential queuing on an Avenue or Boulevard, as designated in the Mobility Plan.

The Project's site access and internal circulation plan would be designed in accordance with LADOT standards outlined in Section 321 of *Manual of Policies and Procedures* (LADOT, December 2008). Consistent with *Manual of Policies and Procedures*, the Project driveway, which serves a project frontage greater than 250 feet, would be placed at a distance greater than 75 feet from the adjacent intersection of Figueroa Street & W. 27th Street. The driveway width would be designed to safely facilitate ingress and egress maneuvers without interference between the two. The driveway would also be placed at a distance from the pedestrian access to limit potential vehicle-pedestrian conflicts. The driveway would also be designed to limit potential obstructions to adequate sight distance.

Additionally, the Project would also provide both short-term and long-term bicycle parking. Bicyclists would access the long-term bicycle parking within the Project via the pedestrian access point. The short-term bicycle parking spaces would be provided along the Project frontage. Convenient connections between the bicycle parking spaces to the AAA Headquarters also would be provided via the marked pedestrian crossing across W. 27th Street.

Therefore, based on the site access and circulation evaluation and approval from the LADOT Correspondence Letter, the Project would not include unusual or hazardous design features, and a less than significant impact would occur without mitigation.

d) Result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if the project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses. As previously discussed in Section VIII(g), the Project Site is not located in a disaster route according to the Los Angeles West Area Disaster Route Map of Los Angeles County.⁹⁵ Additionally, based on the City of Los Angeles Safety Element, the Project Site is not located on an identified disaster route or an adopted emergency response or evacuation plan.⁹⁶ Development of the Project Site may require temporary and/or partial street closures due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way. Further, the Project would be developed in a manner that satisfies the emergency response requirements of the LAFD. There are no hazardous design features included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Additionally, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the Project would not be expected to result in

⁹⁵ Los Angeles County Department of Public Works, *City of Los Angeles West Area Disaster Route Map*, August 13, 2008.

⁹⁶ *City of Los Angeles, Safety Element Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles*, April 1995.

inadequate emergency access and impacts would be less than significant without mitigation.

Mitigation Measures:

MM-TR-1: Construction Management Plan

A detailed Construction Management Plan, including street closure information, detour plans, haul routes, and staging plans, shall be prepared and submitted to LADOT for review and 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 shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and should include the following elements as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls (i.e., flag persons) during all construction activities adjacent to public rights-of-way to ensure traffic safety on public roadways. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety.
- Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag persons).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Coordination with Metro to address any construction near the rail right-of-way.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips in the South Los Angeles Community Plan Area. As noted in Question XVII(b), above, the Project would not result in a net increase in VMT and would be less than the threshold for a significant impact to occur, and the Project’s contribution to cumulative impacts is less than significant and would not be cumulative considerable. Therefore, the Project’s cumulative transportation impact is considered less than significant.

XVIII. Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Recognizing that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources,

the Native American Historic Resource Protection Act (Assembly Bill 52, or AB 52) was signed into law on September 25, 2014. AB 52 applies specifically to projects for which a Notice of Preparation or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration is filed on or after July 1, 2015. AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 was to involve California Native American Tribes⁹⁷ early in the environmental process and to establish a new category of resources related to Native Americans, that require consideration under CEQA, known as tribal cultural resources.

Project Impact Analysis

- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**

Less Than Significant Impact.

Public Resources Code Section 21084.2 establishes that “[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.” A project would cause a substantial adverse change in the significance of a tribal cultural resource with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or if such resource is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Public Resources Code 5024.1(c) states that “[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.

⁹⁷ *Per PRC Section 21073, a "California Native American tribe" means a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission for purposes of Chapter 905 of the Statutes of 2004.*

2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed in response to Checklist Question V.b (Cultural Resources, Archeological Resources), the Project Site and immediately surrounding areas do not contain any known archaeological sites or archaeological survey areas.⁹⁸ Pursuant to the requirements of AB 52, the Department of City Planning sent pre-consultation request letters on June 26, 2020 to local Native American Tribal representatives who are on file with the Department of City Planning as having requested to be notified of future development projects. The City of Los Angeles received a request for consultation from the Gabrielino Band of Mission Indians – Kizh Nation, who has claimed that their tribe is the direct lineal descendants of the project area. Consistent with tribe's request the request for consultation letter and the attachments contain confidential materials and have been marked as confidential materials. Based on a review of the information provided by the tribe, and based on the analysis presented below, the lead agency has determined that there is no substantial evidence indicating that the Proposed Project would result in any adverse impacts to tribal cultural resources. However, the City will incorporate standard conditions of project approval to address the unlikely discovery of any potential tribal cultural resources. After acting in good faith and after reasonable effort, the City has concluded the AB 52 consultation process.

The Project Site is located in a highly urbanized area of the South Los Angeles CPA of the City, and is currently developed with a surface parking lot. As noted in the Phase I ESA (see Appendix E to the IS/MND), based on the aerial photos, topographic maps of the site and the assessor records, the Project Site was originally developed with single-family residential dwellings and multi-family dwellings between 1907 and 1950. These buildings were demolished circa 1969 to allow for the construction of a surface parking lot in 1970. The Project Site has been capped with an asphalt covered surface parking lot since 1970. As noted in the Geotechnical Investigation (see Appendix C to this IS/MND) undocumented artificial fill exists within the upper few feet at the site and may have been associated with original grading operations to construct the parking lot. Based on the recommendations of the Geotechnical Investigation, it is anticipated that

⁹⁸ *City of Los Angeles Department of City Planning, Environmental and Public Facilities Maps: Prehistoric and Historic Archaeological Sites and Survey Areas in the City of Los Angeles, September 1996.*

soil removal will vary from 4 to 6 feet but could locally be deeper. Over-excavation should provide a minimum of 5 feet of fill below the structure or 3 feet below the bottom of foundation elements, whichever is deeper. As the Project would not include any subterranean parking levels and would not involve excavating at a deep level below grade, little if any native soils would be disturbed during construction of the Proposed Project. Nevertheless, the potential exists for the accidental discovery of tribal cultural resources when building the structure's foundations. Because the presence or absence of such materials cannot be determined until the Project Site is graded, it is recommended that the City's standard condition of approval for addressing inadvertent discoveries be incorporated into the project's approval. The City's standard condition requires that upon any discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project and the Department of City Planning. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth in the City's standard conditions of approval. With the implementation of regulatory compliance measures described in Section V(b), and the City's standard conditions of approval for addressing inadvertent discoveries of archaeological or tribal cultural resources, potential impacts to tribal cultural resources would be less than significant without mitigation.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. As noted above, consultation under AB 52 has been concluded. Based on the Project Site's prior soil disturbance and lack of any known Native American resources or sacred sites, the probability for the discovery of a known site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe is considered low. With the regulatory compliance measures and standard conditions of approval to address inadvertent discovery of tribal

cultural resources as referenced above, impacts to tribal cultural resources remain less than significant during Project construction without mitigation.

Mitigation Measures

Project impacts with regard to tribal cultural resources would be less than significant. Therefore, no mitigation measures are required.

Cumulative Impacts

As indicated above, the Project Site does not contain any known tribal cultural resources, nor did the Assembly Bill 52 consultation process provide substantial evidence as to the presence of tribal cultural resources on site. Additionally, compliance with standard conditions of approval and regulatory requirements would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. It is unknown whether or not any of the properties on which the related projects are located contain tribal cultural resources. However, similar to the Project, each of the related projects would be required to follow the regulatory requirements of Assembly Bill 52, as applicable, which includes notifying tribes to solicit consultation and to analyze and mitigate potential impact of tribal cultural resources. Any related project sites that contain tribal cultural resources would be required to comply with conditions of approval and/or site specific mitigation measures to avoid or substantially lessen potential impacts. Therefore, cumulative impacts would be less than significant without mitigation.

XIX. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

Water

The Los Angeles Department of Water and Power (LADWP) supplies the City of Los Angeles with water and is responsible for ensuring that water demands within the City are met. LADWP's 2015 Urban Water Management Plan identifies water efficient strategies to promote the efficient use and management of its water resources. The Chapter XIII of the LAMC and Chapter IX, Article 9 of the LA Green Building Code also establishes water requirements for the City's residential and non-residential development. The City has also enacted Ordinance No. 170,978 and Ordinance No. 181,288 (Emergency Conservation Plan) to impose water conservation measures to landscaping and to ration water during drought conditions, respectively.

Wastewater

The Los Angeles Department of Public Works, Bureau of Sanitation Division (LASAN) provides sewer conveyance infrastructure and wastewater treatment services to the City of Los Angeles. The Los Angeles General Plan Framework Element, Chapter 9, Infrastructure and Public Services, identifies goals, objectives, and policies for utilities within the City, including a goal to provide adequate wastewater collection and treatment capacity to City-owned wastewater treatment facilities. The Los Angeles Integrated Resources Plan (IRP), which addressed interrelated management between

LASAN and LADWP regarding wastewater, stormwater, and recycled water. The IRP projects future wastewater generation based on population projections from SCAG and how population increases will affect the capacity of sewer systems like the Hyperion Water Reclamation Plant. City-prepared One Water LA 2040 provides an integrated approach to Citywide recycled water supply and builds on the IRP to ensure greater resiliency to drought conditions and climate change. In addition, the LA Green New Deal 2019 includes a multi-faceted approach to developing locally sustainable water supplies and reduce reliance on imported water, and it establishes a target of recycling 100% of all wastewater by 2035. The LAMC Sections 64.11 and 64.12 also establish requirements regarding wastewater sewer system services, including the completion of a Sewer Capacity Availability Review (SCAR) to assess the existing sewer capacity of a project site and determine adequate capacity of the existing sewer system for a project.

Solid Waste

At the State level, solid waste is regulated by Assembly Bill 939 (AB 939) which requires all cities, counties, and regional solid waste management agencies to reduce their waste disposal by certain amounts and specifically requires cities and counties to develop Source Reduction and Recycling Elements (SRRE) detailing how diversion goals would be met. At the regional level, the Los Angeles County Integrated Waste Management Plan is comprised of the County’s describes the steps to be taken by local agencies, acting independently and in concert, to achieve the state mandated diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. At a local level, under the City’s Solid Waste Integrated Resources Plan (SWIRP), the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030.⁹⁹

Project Impact Analysis

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

⁹⁹ *City of Los Angeles, Department of Public Works, Bureau of Sanitation, Zero Waste Progress Report, March, 2013.*

Less Than Significant Impact. A significant impact may occur if a project would increase demands upon infrastructure to such a degree that the construction or relocation of facilities currently serving the Project Site would result in significant environmental impacts. The determination of whether a project results in a significant impact on water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities shall be made considering the following factors: (a) the total estimated demand for the project; (b) whether sufficient capacity exists in the infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; and (c) whether improvements or upgrades necessary to serve the project would result in significant environmental impacts.

Water Treatment Facilities and Existing Infrastructure

The Los Angeles Department of Water and Power (LADWP) ensures the reliability and quality of water supply through an extensive distribution system that includes more than 7,200 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).¹⁰⁰ In 2018, the LADWP's water system supplied 4 million customers with over 160 billion gallons of drinking water, resulting in an average daily water demand of approximately 438 mgd. Therefore, the LAAFP has a remaining capacity of treating approximately 162 mgd, which may fluctuate depending on the season.¹⁰¹

The Project would include a parking structure, which does not typically involve water usage. However, the Project would include 13,473 square feet of landscaped areas on the ground level that would require an irrigation system and generate water demand. As shown in Table 4.21, the Project would generate a net increase in water demand of approximately 631 gallons per day (gpd) of water (or approximately 0.71 acre-foot per year), which is significantly below available capacity. The Project's increased water demand would not measurably reduce the LAAFP's capacity. Therefore, no new or

¹⁰⁰ U.S. Department of Energy, website: <https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-aqueduct-filtration-plant-modernization---oxygen-plant-replacement>, accessed December 2019.

¹⁰¹ Los Angeles Department of Water and Power, *Water, L.A.'s Drinking Water Quality Report*, website: <http://www.ladwp.com/>, accessed December 2019.

expanded water treatment facilities would be required. With respect to water treatment facilities, the Project would have a less than significant impact without mitigation.

**Table 4.21
Proposed Project Estimated Water Demand**

Type of Use	Size	Total Water Demand (gpd) ^a
Proposed Project		
Landscaping	13,473 sf	631
Total Water Demand:		631 gpd (0.71 AFY)
<i>Notes: sf =square feet</i> ^a <i>Consumption Rates based on the California Model Water Efficiency Landscape Ordinance, Section B1. Water Budget Calculations.</i> <i>Source: Parker Environmental Consultants, 2019.</i>		

Although no further upgrades are anticipated at this time, in the event that water main and/or other infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely because (a) any disruption of service would be of a short-term nature, (b) the replacement of the water mains would be within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate project vicinity. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Impacts to water treatment and infrastructure would be less than significant without mitigation.

Wastewater Treatment Facilities and Existing Infrastructure

A project would normally have a significant wastewater impact if: (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer’s capacity is already constrained or that would cause a sewer’s capacity to become constrained; or (b) the project’s additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General plan and its elements.

The Project would include the construction and operation of a parking structure. No public restrooms or plumbing fixtures connected to the sanitary sewer are proposed. Therefore, impacts to sewer capacity and infrastructure would be less than significant without mitigation.

Stormwater Drainage Facilities

As described in Question X(c), the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. The Project would be required to demonstrate compliance with Low Impact Development (LID) standards and retain or treat the first 3/4-inch of rainfall in a 24-hour period or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. The Project Site is currently developed with surface parking. Runoff from the Project Site currently is and would continue to be directed towards existing storm drains in the Project vicinity. As stated previously in response to Checklist Question X, the Project shall comply with NPDES requirements and the LID regulations, and implement Best Management Practices (BMPs) during the construction and operation of the Project.

The appropriate design and application of BMPs devices and facilities shall be determined by the Watershed Protection Division of the Bureau of Sanitation, Department of Public Works. Thus, development of the Project would not create or contribute to runoff water, which may exceed the capacity of existing or planned stormwater drainage systems. Therefore, Project impacts to stormwater drainage facilities would be considered less than significant without mitigation.

Electricity

The Project Site is located in a highly urbanized area in the South Los Angeles Community. Based on observation, there are overhead circuit lines along the adjacent alleyway to the south of the Project Site. Since electricity is required to light the interior and exterior areas of the proposed parking structure, the Project may require on-site transformers and may require underground line extension on public streets. In the event infrastructure upgrades are required for the proposed development, such infrastructure improvements would be conducted within the right-of-way easements serving the Project Site area, and would not create a significant impact to the physical environment. This is largely due to the fact that (a) any disruption of service would be short-term, (b) upgrades would be conducted within public rights-of-way, and (c) any foreseeable infrastructure improvements would be limited to the immediate Project Site vicinity. Therefore, potential impacts resulting from energy infrastructure improvements would be less than significant without mitigation.

The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Project is part of the total load growth forecast for the City and has been taken into account by LADWP in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's Power SLTRP incorporates the

estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Electricity supplies from LADWP are adequate to serve the Project, and any improvements to existing infrastructure would not be expected to result in any significant secondary environmental effects. Therefore, the Project impacts to local and regional electricity supplies and existing electrical facilities would be less than significant without mitigation.

Natural Gas

Since the Project would consist of a parking structure, natural gas would not be utilized during operation of the Project. Therefore, no impact would occur with respect to the natural gas infrastructure.

Telecommunications

Since the Project would consist of a parking structure, the Project would not require any telecommunications facilities. Therefore, no impact would occur with respect to the telecommunications infrastructure.

Cumulative Impacts

Water Infrastructure

The Project and related projects have the potential to increase demands upon the local water infrastructure serving the Project Site and surrounding area. The Proposed Project would require minimal localized construction activities to connect to the existing water main to serve the on-site landscaping. Based on a review of the six related projects identified in Table 3.3, above, these nearby related projects would have the potential to impact the local water lines serving the Project Site. Similar to the Proposed Project, these related projects would be required to consult with the LADWP to ensure the local infrastructure is adequate to serve their projects. In the event system upgrades are anticipated the construction impacts associated with such upgrades would be localized in nature involving trenching and connections to the existing service lines and would not combine with the Project’s construction impacts resulting in significant physical environmental impacts. The increased water demand would also not measurably impact the LAAFP’s treatment capacity; therefore, no new or expanded water treatment facilities would be required. Thus, cumulative impacts related to connections or improvements to the existing water infrastructure serving the Project and surrounding area would be less than significant.

Wastewater Infrastructure

As a parking structure with ground level landscaping, the Project would not generate any additional wastewater flows. As such, the Proposed Project would not contribute to any cumulative impacts related to wastewater generation. Each related project would be required to submit a Sewer Capacity Availability Request (SCAR) and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project on a case by case basis.

Electricity

Development of the Proposed Project in conjunction with the six related projects that are located within the City of Los Angeles would further increase demand for electricity service provided by LADWP. As discussed in detail in Section VI, Energy, the LADWP's 2017 SLTRP document serves as a comprehensive 20-year plan to supply reliable electricity to the City of Los Angeles in an environmentally responsible and cost effective manner. Further, in accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code and the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Compliance with Title 24 energy conservation standards, City of Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Furthermore, these related projects would be required to consult with the LADWP to ensure the local infrastructure is adequate to serve their projects. In the event system upgrades are anticipated, the construction impacts associated with such upgrades would be localized in nature involving trenching and connections to the existing service lines and would not combine with the Project's construction impacts resulting in significant physical environmental impacts. Cumulative impacts to electricity services and infrastructure would therefore be less than significant.

Natural Gas

As a parking structure with ground level landscaping, the Project would not generate any natural gas demand. As such, the Proposed Project would not contribute to any cumulative impacts related to the natural gas infrastructure. Each of the related projects would be reviewed on a case-by-case basis to determine the SoCalGas' ability to serve each related project. As such, cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

Telecommunications

Since the Project would consist of a parking structure, the Project would not require any telecommunications facilities. Telecommunication services for the six related projects within the City of Los Angeles would be provided by several commercial service providers, including AT&T, Charter/Spectrum, Cox Communications, Frontier, and Race Communications. Establishing service to each of the related projects would involve disconnecting existing connections and establishing new connections to each of the proposed structures. Such improvements would be analyzed on a case-by-case basis. Connection improvements would be localized in nature and would utilize existing conduit and service lines. Therefore, the Project would not combine with related projects to result in cumulative impacts. Thus, the cumulative impacts to telecommunication facilities and infrastructure would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. The determination of whether the Project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District (MWD) of Southern California, which is obtained from the Colorado River Aqueduct. The MWD utilizes a land-use based planning tool that allocates projected demographic data from the SCAG into water service areas for each of MWD's member agencies. The 2015 Urban Water Management Plan (UWMP), which estimates future demand based on population and growth estimated reported in SCAG's RTP/SCS, projects a total water demand and supply of 675,685 AFY in 2040. With its current water supplies, planned future water conservation, and planned future water supplies, LADWP will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. Through various conservation strategies, the LADWP will be able to

reduce the City's water demand during dry years to respond to any reductions to water supplies during multiple dry years.

As shown in Table 4.21, the Project's net increase for water demand would be 631 gallons per day. Accordingly, the Project's anticipated water demand has been accounted for and would not exceed the water demand estimates of the City's 2015 UWMP. Additionally, the Proposed Project's growth is consistent with SCAG's growth projections for the Los Angeles subregion and its use, density, and development envelope are consistent with the LAMC and the Community Plan. Thus, the Project would have a less-than-significant impact on water demand without mitigation.

The Project's landscaping would be required to comply with Los Angeles City Ordinance No. 170,978 and the City of Los Angeles Irrigation Guidelines, which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

The City has enacted legislation to address the water supply shortages caused by the recent statewide drought. Los Angeles City Ordinance No. 181,288 (Emergency Water Conservation Plan) imposes phased water rationing during drought conditions and imposes penalties for users that do not comply. When water rationing is in effect, landscape irrigation is prohibited between the hours of 9:00 AM and 4:00 PM. Specific watering days and maximum irrigation rates are also defined in this ordinance. Compliance with the regulatory compliance measures identified above would reduce the Project's demands for potable water resources to a less than significant level without mitigation.

Cumulative Impacts

Less Than Significant Impact. Development of the Project, related projects and the cumulative growth throughout the City would further increase the demand for potable water within the City. Through the 2015 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040, with implementation of conservation strategies and proper supply management. This estimate is based in part on demographic projections obtained for the LADWP service area from the Metropolitan Water District (MWD). The MWD utilizes a land-use based planning tool that allocates projected demographic data from SCAG into water service areas for each of MWD's member agencies. MWD's demographic projections use data reported in SCAG's RTP/SCS. As discussed previously in Section XIV, Population and Housing, the Proposed Project would not generate any employment or housing growth

and therefore would not conflict with SCAG’s regional growth projections for the City sub region. The limited water demand generated by landscaping would be well under any residential or commercial land use under the existing RD1.5-1-O or proposed C2-2-O zone. As such, the Project’s contribution to cumulative impacts upon water supplies would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

Less Than Significant Impact. A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB). Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information which may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements. The LARWQCB enforces wastewater treatment and discharge requirements for properties in the Project Site area.

The Proposed Project would not generate any wastewater to the City’s sanitary sewer system. Therefore, a less than significant impact would occur without mitigation.

Cumulative Impacts

Less Than Significant Impact. As a parking structure with ground level landscaping, the Project would not generate any additional wastewater flows. As such, the Proposed Project would not contribute to any cumulative impacts related to wastewater generation. Each related project would be required to submit a Sewer Capacity Availability Request (SCAR) and obtain approval by the Department of Public Works to ensure adequate sewer capacity for each related project on a case by case basis.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. The determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste

generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the BOS provides waste collection services to single-family and some small multi-family developments, private haulers 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 recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030.¹⁰² State law (AB 341) currently requires at least 50% solid waste diversion and establishes a state-wide goal of not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012, the City achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.¹⁰³

Moreover, state law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation, and processing of commercial and multi-family solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the

¹⁰² *City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013, Final Adoption, April 2015.*

¹⁰³ *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Operation

The Project Site is located within the South Los Angeles Commercial Waste Franchise Zone, which is served under contract to Republic Services. Since the Project would include a parking structure, it is anticipated that the Project would not generate any solid waste. As such, the Project would not require solid waste collection, and operational impacts to solid waste collection and landfill capacities would be less than significant without mitigation.

Construction

During construction, on-site concrete and asphalt from the existing surface parking lot would be removed and disposed. The Los Angeles County has separate landfill facilities that accept construction and demolition (C&D) waste that can be recycled. The nearest waste transfer stations to the Project Site that accepts concrete and asphalt is the 25th Street Recycling facilities, located approximately 3 miles east of the Project Site and the Waste Management Downtown Diversion facility, located approximately 4 miles east of the Project Site.

The Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the BOS, all construction and demolition debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. Based on the calculations provided in Table 4.22, it is estimated that the proposed construction activities would generate approximately 1,943 tons of debris during the demolition and construction process that would be exported to a landfill located within the City. In order to meet the diversion goals of the California Integrated Waste Management Act and the City, the Applicant's contractor would be required to obtain an AB 939 Compliance Permit from the BOS certifying the delivery of the construction and demolition waste to a certified construction and demolition waste processing facility. As such, the Project's construction impacts to solid waste collection and landfill capacities would be less than significant without mitigation.

Cumulative Impacts

Since the Project would include a parking structure, it is anticipated that the Project would not generate any solid waste. The impact of the continued growth of the region

would likely have the effect of diminishing the daily excess capacity of the regional landfills. The related projects and future projects within the County of Los Angeles' waste shed area would be subject to regional source reduction and recycling programs, significantly reducing the amount of solid waste deposited in area landfills. Additionally, the 2018 County Integrated Waste Management Plan accounts for cumulative waste generation for the 15-year planning period ending in 2033, as the analysis includes projected growth. Since there is currently adequate capacity to accommodate the cumulative disposal needs of the Project and related projects, cumulative impacts with respect to solid waste would be less than significant.

**Table 4.22
Estimated Construction and Demolition Debris**

Construction Activity	Size	Rate ^{a,b}	Generated Waste (tons)
Demolition			
Surface Parking	69,731 sf (1,291 cy) ^c	2,400 lbs/cy	1,550
Construction			
Parking Structure	202,200 sf	3.89 lbs/sf	393
Total Debris:			1,943
<i>Notes: sf= square feet</i> ^a CalRecycle, <i>Calculations, Solid Waste Cleanup Program Weights and Volumes for Project Estimates</i> , website: https://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations , accessed December 2019. ^b The parking structure solid waste rates are based on USEPA Report No EPA530-98-010, <i>Characterization of Building Related Construction and Demolition Debris in the United States</i> , July 1998. ^c It is estimated that asphalt removal during demolition would be graded approximately ½-foot below grade. Source: Parker Environmental Consultants, 2019.			

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal.

As discussed above, a parking structure would not require solid waste collection. Therefore, federal, state, and local regulations related to solid waste would not apply to the operations of the Project. However, the Project would be consistent with the

applicable regulations associated with solid waste from construction. The Project would comply with AB 939 and City waste diversion goals, as applicable. The Project would recycle the concrete and asphalt to a certified construction and demolition waste processing facility. Since the Project would comply with applicable federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

Cumulative Impacts

Less Than Significant Impact. Development of the Project in conjunction with related project with residential, commercial, or office land uses, would further increase regional demands on landfill capacity. The impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the existing landfills serving the City. Based on the 2017 Los Angeles County Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the countywide cumulative need for Class III landfill disposal capacity of approximately 126.4 million tons in the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons.¹⁰⁴ However, solutions to resolve the regional solid waste disposal needs beyond 2030 are continuously being investigated at the state, regional, and local levels. The regional scenario analyses presented in the Countywide Integrated Waste Management Plan - Los Angeles County - Countywide Summary Plan and Citing Element (adopted December 2016) demonstrate that the County could meet its disposal capacity needs by promoting extended producer responsibility, continuing to enhance diversion programs and increasing the Countywide diversion rate, and developing conversion and other alternative technologies. Additionally, by successfully permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal facilities, and developing infrastructure to facilitate exportation of waste to out-of-County landfills, the County may further ensure adequate disposal capacity is available throughout the planning period. Thus, cumulative impacts with respect to regional solid waste impacts would be less than significant without mitigation.

Furthermore, it should be noted that the City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The BOS has projected the need for waste disposal capacity based on SCAG’s regional population growth projections. Projects within the City must comply with the City’s SRRE.

¹⁰⁴ *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.*

As of 2012, the City achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.¹⁰⁵ Waste diversion rates are required to increase to 75 percent by 2025 and through on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling and composting programs have been implemented. The City is also developing programs to ultimately meet a goal of zero waste by 2030. Related projects would participate in regional source reduction and recycling programs significantly reducing the amount of solid waste deposited in area landfills. The Project’s contribution to cumulative solid waste impacts would not be cumulatively considerable, and cumulative impacts with respect to solid waste would be less than significant without mitigation.

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹⁰⁵ City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.

Regulatory Setting

Areas at risk for wildfire are designated as Fire Hazard Severity Zones, and these designations include Very High, High, and Moderate Fire Hazard Severity Zones. Figure 4.8-2, Fire Hazard Severity Zone Policy Map, created by the Los Angeles County Department of Regional Planning depicts the varying fire hazard severity designations within Los Angeles County and shows the jurisdictions of the Federal Responsible Area (FRAs), State Responsibility Areas (SRAs), and Local Responsibility Areas (LRAs).

Project Impact Analysis

Responses a through d: No Impact. A potential significant impact upon wildfire hazards could occur if the Project Site were to be located on state responsibility areas or lands classified as very high fire hazard severity zones. Lands subject to this provision have been designated by the LAFD pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code. The Very High Fire Hazard Severity Zone (VHFHSZ) was first established in the City in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone." The Project Site is not located within a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, these checklist questions are not applicable to the Project, and no impact would occur.

XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. A significant impact would occur only if the Project results in potentially significant impacts for any of the above issues. The Project is located in a densely populated urban area and would have no significant impacts with respect to biological resources or California’s history or pre-history. As noted in the analysis above, the Project Site is currently developed with a surface parking lot and does not support any substantial habitat of a fish or wildlife species. Vegetation on the Project Site is limited to street trees along the public right-of-way along W. 27th Street. Of the 10 existing street trees, at least one tree would need to be removed as a result of project construction to facilitate the realignment of the driveway entrance. The removal of trees would have the potential to impact nesting bird species if any nesting birds are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 20*) and Sections 3503, 3503.5, and 3513 of the California Department of Fish and Game Code. Additionally, although no known direct impacts to historic resources are anticipated, compliance with existing regulatory compliance regulations would ensure any impacts upon cultural resources

are less than significant level in the unlikely event any such historic, archaeological, or paleontological materials are accidentally discovered during the construction process.

Therefore, with adherence to regulatory compliance measures, the Project would not have the potential to degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Impacts would be less than significant without mitigation.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if the Project, in conjunction with other related projects in the area of the Project Site, would result in impacts that would be less than significant when viewed separately, but would be significant when viewed together. As concluded in the cumulative impact analysis provided under each Checklist Question above, the Project’s incremental contribution to cumulative impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, utilities, tribal cultural resources, and wildland fire hazards would be less than significant. As such, the Project’s contribution to cumulative impacts would be less than significant without mitigation.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly after mitigation. Thus, with mitigation, any potentially significant impacts to humans would be less than significant without mitigation.

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2. Acronyms and Abbreviations

AAM	Annual Arithmetic Mean
AB	Assembly Bill
ACM	Asbestos-containing materials
AEP	Association of Environmental Professionals
AFY	Acre-feet per year
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
Basin	South Coast Air Basin
BMPs	Best Management Practices
C/D	construction/demolition
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Caltrans	California Department of Transportation
Cal/EPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code (2007)
CCAA	California Clean Air Act
CCAR	California Climate Action Registry
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
Cf	Cubic feet
CFC	Chlorofluorocarbons
CGS	California Geological Survey
CH ₄	Methane
CHMIRS	California Hazardous Material Incident Report System
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMA	California Integrated Waste Management Act
CLARTS	Central Los Angeles Refuse Transfer Station
CMP	Congestion Management Plan
CNEL	Community Noise Exposure Level

CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
COHb	carboxyhemoglobin
COPC	Chemical of Potential Concern
CORRACTS	Corrective Action Treatment, Storage, and Disposal Facilities
CPA	Community Plan Area
CPT	cone penetrometer test
CPU	Crime Prevention Unit
CRA/LA	Community Redevelopment Agency of the City of Los Angeles
CUP	conditional use permit
CWA	Clean Water Act
CWC	California Water Code
cy	cubic yards
dB	decibel
dBA	A-weighted decibel scale
d/D	flow level
DHS	California Department of Health and Services
DOGGR	California Department of Conservation Division of Oil, Gas, and Geothermal Resources
DWP	Department of Water and Power
DWR	California Department of Water Resources
du	dwelling unit
EIR	Environmental Impact Report
EMS	Emergency Medical Service
EOO	Emergency Operations Organization
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
EZ	Los Angeles State Enterprise Zone
FAR	Floor Area Ratio
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTIP	Federal Transportation Improvement Program
GBCI	Green Building Certification Institute
GHG	greenhouse gas
gpd	gallons per day
gpm	gallons per minute
GWP	Global Warming Potential
HFC	hydrofluorocarbons
HQTA	High-Quality Transit Areas
HSA	Hyperion Service Area
HTP	Hyperion Treatment Plant
HVAC	Heating, Ventilation and Air Conditioning
I-101	Hollywood Freeway

ISO	Interim Control Ordinance
ITE	Institute of Transportation Engineers
km	kilometers
kV	kilovolt
kWh	kilowatt-hours
LAA	Los Angeles Aqueduct
LAAFP	Los Angeles Aqueduct Filtration Plant
LABC	City of Los Angeles Building Code
LABS	Los Angeles Department of Public Works Bureau of Sanitation
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	Lead-based paint
lbs/day	pounds per day
LCFS	Low Carbon Fuel Standard
L _{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L _{eq}	equivalent energy noise level/ambient noise level
LID	Low Impact Development
LOS	Level of Service
LST	localized significance thresholds
LUST	leaking underground storage tank
LUTP	Land Use/Transportation Policy
MBTA	Migratory Bird Treaty Act
MCE	Maximum Considered Earthquake
MEP	maximum extent practicable
MERV	Minimum Efficiency Reporting Value
Metro	Los Angeles County Metropolitan Transit Authority
mgd	million gallons per day
mi	miles
MPO	Metropolitan Planning Organization
MS4	medium and large municipal separate storm sewer systems
msl	mean sea level
mm	millimeters
M _{max}	maximum moment magnitude
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District
MWh	Mega-Watt hours
N ₂ O	nitrous oxide

NAAQS	National ambient air quality standards
NAHC	Native American Heritage Commission
NFRAP	No Further Remedial Action Planned Sites
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
O ₃	Ozone
OAL	California Office of Administrative Law
OPR	Office of Planning and Research
Pb	lead
PCB	polychlorinated biphenyl
PCE	tetrachloroethylene
PEC	Potential environmental concern
PFC	perfluorocarbons
PGA	peak horizontal ground acceleration
PM	particulate matter
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
ppd	pounds per day
ppm	parts per million
PSI	pounds per square inch
PUC	Public Utilities Commission (also see CPUC)
PWS	Public water suppliers
RCP	Regional Comprehensive Plan
RCPG	Regional Comprehensive Plan and Guide
RCRA	Resource Conservation Recovery Act
RD	Reporting District
REC	Recognized Environmental Condition
ROG	Reactive Organic Gases
ROWD	Report of Waste Discharge
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
sf	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SLIC	Spills, Leaks, Investigation and Cleanup
SO ₂	sulfur dioxide
SO ₄	sulfates

SOx	sulfur oxides
SOPA	Society of Professional Archeologist
SPT	Standard Penetration Test
SR-110	Harbor Freeway
SRA	source receptor area
SRRE	Source Reduction and Recycling Element
SUSMP	Standard Urban Storm Water Mitigation Plan
SWAT	Solid Waste Assessment Test
SWF/LF	Solid Waste Information System
SWFP	Solid Waste Facility Permit
SWMP	Stormwater Management Plan
SWMPP	Solid Waste Management Policy Plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TCM	transportation control measures
TDM	Transportation Demand Management Plan
TFAR	Transfer of Floor Area Rights
TIA	Traffic Impact Assessment
TOD	Transit Oriented District
TPH	total petroleum hydrocarbons
TSD	Treatment, Storage, and Disposal
TSP	Transportation Specific Plan
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S.EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	U.S. Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	Volume-to-Capacity
VCP	Voluntary Cleanup Plan
VdB	Vibration decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
VRF	Variable Refrigerant Flow Air-conditioning
WE	Water Efficiency
WMA	Watershed Management Area
WMUDS	Waste Management Unit Database System
WSA	Water Supply Assessment
µg/m ³	micrograms per cubic meter
ZIMAS	Zoning Information and Map Access System

APPENDIX A: AIR QUALITY WORKSHEETS

AAA Parking Structure - South Coast AQMD Air District, Summer

AAA Parking Structure

South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking with Elevator	750.00	Space	1.60	202,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	11			Operational Year	2021
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 - Project data per architectural plan submittal package dated Oct 22, 219.

Construction Phase - Construction timeline assumes start of construction in fourth quarter of 2020 and an approximate 12 month buildout (completed in 2021).

Grading - Assumes 11,233 cy of soil export for earthwork and foundation preparation.

Demolition - Assumes demo of 69,931 sf of asphalt parking lot = 1,291 cy of debris (eq. to 1,550 tons)

Trips and VMT - Hauling trips conservatively estimated based on 14 cy hauling capacity. Assumes 1,291 cy of asphalt debris during demolition, 11,233 cy of soil export during grading, and 393 tons of C&D debris during construction.

Construction Off-road Equipment Mitigation - Mitigation scenario includes compliance with Rule 403 (dust suppression)

AAA Parking Structure - South Coast AQMD Air District, Summer

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	15.00
tblConstructionPhase	NumDays	200.00	180.00
tblConstructionPhase	NumDays	20.00	10.00
tblConstructionPhase	NumDays	4.00	30.00
tblConstructionPhase	PhaseEndDate	8/10/2021	8/17/2021
tblConstructionPhase	PhaseEndDate	7/13/2021	7/5/2021
tblConstructionPhase	PhaseEndDate	9/28/2020	9/14/2020
tblConstructionPhase	PhaseEndDate	10/6/2020	10/26/2020
tblConstructionPhase	PhaseStartDate	10/7/2020	10/27/2020
tblConstructionPhase	PhaseStartDate	10/1/2020	9/15/2020
tblGrading	MaterialExported	0.00	11,233.00
tblLandUse	LandUseSquareFeet	300,000.00	202,200.00
tblLandUse	LotAcreage	6.75	1.60
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	153.00	184.00
tblTripsAndVMT	HaulingTripNumber	1,404.00	1,604.00
tblTripsAndVMT	HaulingTripNumber	0.00	68.00

2.0 Emissions Summary

AAA Parking Structure - South Coast AQMD Air District, Summer

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	0.0942	7.1000e-004	0.0769	1.0000e-005	0.0000	2.7000e-004	2.7000e-004	0.0000	2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004	0.0000	0.1750

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	0.0942	7.1000e-004	0.0769	1.0000e-005	0.0000	2.7000e-004	2.7000e-004	0.0000	2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004	0.0000	0.1750

AAA Parking Structure - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2020	9/14/2020	5	10	
2	Grading	Grading	9/15/2020	10/26/2020	5	30	
3	Building Construction	Building Construction	10/27/2020	7/5/2021	5	180	
4	Paving	Paving	7/14/2021	7/27/2021	5	10	
5	Architectural Coating	Architectural Coating	7/28/2021	8/17/2021	5	15	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.25

Acres of Paving: 1.6

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 12,132 (Architectural Coating – sqft)

OffRoad Equipment

AAA Parking Structure - South Coast AQMD Air District, Summer

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

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	5	13.00	0.00	184.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	1,604.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	85.00	33.00	68.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	17.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

AAA Parking Structure - South Coast AQMD Air District, Summer

3.1 Mitigation Measures Construction

Water Exposed Area

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					3.3168	0.0000	3.3168	0.5022	0.0000	0.5022			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	3.3168	1.1525	4.4693	0.5022	1.0761	1.5783		2,322.3127	2,322.3127	0.5970		2,337.2363

AAA Parking Structure - South Coast AQMD Air District, Summer

3.2 Demolition - 2020

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	0.1939	6.6107	1.3925	0.0204	0.4821	0.0238	0.5059	0.1321	0.0228	0.1549		2,202.9843	2,202.9843	0.1380		2,206.4353
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	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.2527	6.6502	1.9240	0.0219	0.6274	0.0249	0.6523	0.1706	0.0238	0.1945		2,351.7586	2,351.7586	0.1423		2,355.3165

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					1.2936	0.0000	1.2936	0.1959	0.0000	0.1959			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	1.2936	1.1525	2.4461	0.1959	1.0761	1.2720	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363

AAA Parking Structure - South Coast AQMD Air District, Summer

3.2 Demolition - 2020

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	0.1939	6.6107	1.3925	0.0204	0.4821	0.0238	0.5059	0.1321	0.0228	0.1549		2,202.9843	2,202.9843	0.1380		2,206.4353
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	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.2527	6.6502	1.9240	0.0219	0.6274	0.0249	0.6523	0.1706	0.0238	0.1945		2,351.7586	2,351.7586	0.1423		2,355.3165

3.3 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					4.9566	0.0000	4.9566	2.5320	0.0000	2.5320			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9566	0.6844	5.6410	2.5320	0.6296	3.1617		1,365.7183	1,365.7183	0.4417		1,376.7609

AAA Parking Structure - South Coast AQMD Air District, Summer

3.3 Grading - 2020

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	0.5634	19.2093	4.0464	0.0592	1.4009	0.0693	1.4701	0.3839	0.0663	0.4501		6,401.4255	6,401.4255	0.4011		6,411.4533
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	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.5996	19.2336	4.3734	0.0601	1.4903	0.0699	1.5602	0.4076	0.0669	0.4745		6,492.9789	6,492.9789	0.4037		6,503.0725

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					1.9331	0.0000	1.9331	0.9875	0.0000	0.9875			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	1.9331	0.6844	2.6175	0.9875	0.6296	1.6171	0.0000	1,365.7183	1,365.7183	0.4417		1,376.7609

AAA Parking Structure - South Coast AQMD Air District, Summer

3.3 Grading - 2020

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	0.5634	19.2093	4.0464	0.0592	1.4009	0.0693	1.4701	0.3839	0.0663	0.4501		6,401.4255	6,401.4255	0.4011		6,411.4533
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	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.5996	19.2336	4.3734	0.0601	1.4903	0.0699	1.5602	0.4076	0.0669	0.4745		6,492.9789	6,492.9789	0.4037		6,503.0725

3.4 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	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.1595	2,001.1595	0.3715		2,010.4467

AAA Parking Structure - South Coast AQMD Air District, Summer

3.4 Building Construction - 2020

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	3.9800e-003	0.1357	0.0286	4.2000e-004	0.0305	4.9000e-004	0.0310	7.7700e-003	4.7000e-004	8.2400e-003		45.2304	45.2304	2.8300e-003		45.3012
Vendor	0.1084	3.4629	0.8246	8.4900e-003	0.2112	0.0172	0.2284	0.0608	0.0164	0.0772		905.6799	905.6799	0.0569		907.1015
Worker	0.3846	0.2585	3.4750	9.7700e-003	0.9501	7.2100e-003	0.9573	0.2520	6.6400e-003	0.2586		972.7548	972.7548	0.0280		973.4540
Total	0.4969	3.8571	4.3281	0.0187	1.1918	0.0249	1.2167	0.3205	0.0235	0.3441		1,923.6651	1,923.6651	0.0877		1,925.8567

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	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467

AAA Parking Structure - South Coast AQMD Air District, Summer

3.4 Building Construction - 2020

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	3.9800e-003	0.1357	0.0286	4.2000e-004	0.0305	4.9000e-004	0.0310	7.7700e-003	4.7000e-004	8.2400e-003		45.2304	45.2304	2.8300e-003		45.3012
Vendor	0.1084	3.4629	0.8246	8.4900e-003	0.2112	0.0172	0.2284	0.0608	0.0164	0.0772		905.6799	905.6799	0.0569		907.1015
Worker	0.3846	0.2585	3.4750	9.7700e-003	0.9501	7.2100e-003	0.9573	0.2520	6.6400e-003	0.2586		972.7548	972.7548	0.0280		973.4540
Total	0.4969	3.8571	4.3281	0.0187	1.1918	0.0249	1.2167	0.3205	0.0235	0.3441		1,923.6651	1,923.6651	0.0877		1,925.8567

3.4 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	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608		2,001.2200	2,001.2200	0.3573		2,010.1517
Total	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608		2,001.2200	2,001.2200	0.3573		2,010.1517

AAA Parking Structure - South Coast AQMD Air District, Summer

3.4 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.8100e-003	0.1255	0.0283	4.1000e-004	0.0126	4.4000e-004	0.0131	3.3800e-003	4.2000e-004	3.8000e-003		44.7532	44.7532	2.8000e-003		44.8232
Vendor	0.0918	3.1474	0.7469	8.4200e-003	0.2112	6.3400e-003	0.2175	0.0608	6.0600e-003	0.0669		899.0469	899.0469	0.0544		900.4066
Worker	0.3588	0.2327	3.2022	9.4500e-003	0.9501	6.9900e-003	0.9571	0.2520	6.4400e-003	0.2584		941.2928	941.2928	0.0253		941.9256
Total	0.4544	3.5055	3.9774	0.0183	1.1739	0.0138	1.1877	0.3162	0.0129	0.3291		1,885.0930	1,885.0930	0.0825		1,887.1554

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608	0.0000	2,001.2200	2,001.2200	0.3573		2,010.1517
Total	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608	0.0000	2,001.2200	2,001.2200	0.3573		2,010.1517

AAA Parking Structure - South Coast AQMD Air District, Summer

3.4 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.8100e-003	0.1255	0.0283	4.1000e-004	0.0126	4.4000e-004	0.0131	3.3800e-003	4.2000e-004	3.8000e-003		44.7532	44.7532	2.8000e-003		44.8232
Vendor	0.0918	3.1474	0.7469	8.4200e-003	0.2112	6.3400e-003	0.2175	0.0608	6.0600e-003	0.0669		899.0469	899.0469	0.0544		900.4066
Worker	0.3588	0.2327	3.2022	9.4500e-003	0.9501	6.9900e-003	0.9571	0.2520	6.4400e-003	0.2584		941.2928	941.2928	0.0253		941.9256
Total	0.4544	3.5055	3.9774	0.0183	1.1739	0.0138	1.1877	0.3162	0.0129	0.3291		1,885.0930	1,885.0930	0.0825		1,887.1554

3.5 Paving - 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	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830		1,296.8664	1,296.8664	0.4111		1,307.1442
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830		1,296.8664	1,296.8664	0.4111		1,307.1442

AAA Parking Structure - South Coast AQMD Air District, Summer

3.5 Paving - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0549	0.0356	0.4897	1.4400e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		143.9624	143.9624	3.8700e-003		144.0592
Total	0.0549	0.0356	0.4897	1.4400e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		143.9624	143.9624	3.8700e-003		144.0592

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	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830	0.0000	1,296.8664	1,296.8664	0.4111		1,307.1442
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830	0.0000	1,296.8664	1,296.8664	0.4111		1,307.1442

AAA Parking Structure - South Coast AQMD Air District, Summer

3.5 Paving - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0549	0.0356	0.4897	1.4400e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		143.9624	143.9624	3.8700e-003		144.0592
Total	0.0549	0.0356	0.4897	1.4400e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		143.9624	143.9624	3.8700e-003		144.0592

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	3.7488					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	3.9677	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309

AAA Parking Structure - South Coast AQMD Air District, Summer

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0718	0.0465	0.6404	1.8900e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		188.2586	188.2586	5.0600e-003		188.3851
Total	0.0718	0.0465	0.6404	1.8900e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		188.2586	188.2586	5.0600e-003		188.3851

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	3.7488					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	3.9677	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

AAA Parking Structure - South Coast AQMD Air District, Summer

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0718	0.0465	0.6404	1.8900e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		188.2586	188.2586	5.0600e-003		188.3851
Total	0.0718	0.0465	0.6404	1.8900e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		188.2586	188.2586	5.0600e-003		188.3851

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

AAA Parking Structure - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unenclosed Parking with Elevator	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

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
Unenclosed Parking with	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
Unenclosed Parking with Elevator	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

5.0 Energy Detail

AAA Parking Structure - South Coast AQMD Air District, Summer

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	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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					
Unenclosed 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		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

AAA Parking Structure - South Coast AQMD Air District, Summer

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unenclosed 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		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Unmitigated	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

AAA Parking Structure - South Coast AQMD Air District, Summer

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	0.0154					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0716					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.1800e-003	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Total	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

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	0.0154					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0716					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.1800e-003	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Total	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

7.0 Water Detail

AAA Parking Structure - South Coast AQMD Air District, Summer

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

AAA Parking Structure - South Coast AQMD Air District, Winter

AAA Parking Structure

South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking with Elevator	750.00	Space	1.60	202,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	11			Operational Year	2021
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 - Project data per architectural plan submittal package dated Oct 22, 219.

Construction Phase - Construction timeline assumes start of construction in fourth quarter of 2020 and an approximate 12 month buildout (completed in 2021).

Grading - Assumes 11,233 cy of soil export for earthwork and foundation preparation.

Demolition - Assumes demo of 69,931 sf of asphalt parking lot = 1,291 cy of debris (eq. to 1,550 tons)

Trips and VMT - Hauling trips conservatively estimated based on 14 cy hauling capacity. Assumes 1,291 cy of asphalt debris during demolition, 11,233 cy of soil export during grading, and 393 tons of C&D debris during construction.

Construction Off-road Equipment Mitigation - Mitigation scenario includes compliance with Rule 403 (dust suppression)

AAA Parking Structure - South Coast AQMD Air District, Winter

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	15.00
tblConstructionPhase	NumDays	200.00	180.00
tblConstructionPhase	NumDays	20.00	10.00
tblConstructionPhase	NumDays	4.00	30.00
tblConstructionPhase	PhaseEndDate	8/10/2021	8/17/2021
tblConstructionPhase	PhaseEndDate	7/13/2021	7/5/2021
tblConstructionPhase	PhaseEndDate	9/28/2020	9/14/2020
tblConstructionPhase	PhaseEndDate	10/6/2020	10/26/2020
tblConstructionPhase	PhaseStartDate	10/7/2020	10/27/2020
tblConstructionPhase	PhaseStartDate	10/1/2020	9/15/2020
tblGrading	MaterialExported	0.00	11,233.00
tblLandUse	LandUseSquareFeet	300,000.00	202,200.00
tblLandUse	LotAcreage	6.75	1.60
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	153.00	184.00
tblTripsAndVMT	HaulingTripNumber	1,404.00	1,604.00
tblTripsAndVMT	HaulingTripNumber	0.00	68.00

2.0 Emissions Summary

AAA Parking Structure - South Coast AQMD Air District, Winter

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	0.0942	7.1000e-004	0.0769	1.0000e-005	0.0000	2.7000e-004	2.7000e-004	0.0000	2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004	0.0000	0.1750

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	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	0.0942	7.1000e-004	0.0769	1.0000e-005	0.0000	2.7000e-004	2.7000e-004	0.0000	2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004	0.0000	0.1750

AAA Parking Structure - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2020	9/14/2020	5	10	
2	Grading	Grading	9/15/2020	10/26/2020	5	30	
3	Building Construction	Building Construction	10/27/2020	7/5/2021	5	180	
4	Paving	Paving	7/14/2021	7/27/2021	5	10	
5	Architectural Coating	Architectural Coating	7/28/2021	8/17/2021	5	15	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.25

Acres of Paving: 1.6

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 12,132 (Architectural Coating – sqft)

OffRoad Equipment

AAA Parking Structure - South Coast AQMD Air District, Winter

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

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	5	13.00	0.00	184.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	1,604.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	85.00	33.00	68.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	17.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

AAA Parking Structure - South Coast AQMD Air District, Winter

3.1 Mitigation Measures Construction

Water Exposed Area

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					3.3168	0.0000	3.3168	0.5022	0.0000	0.5022			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761		2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	3.3168	1.1525	4.4693	0.5022	1.0761	1.5783		2,322.3127	2,322.3127	0.5970		2,337.2363

AAA Parking Structure - South Coast AQMD Air District, Winter

3.2 Demolition - 2020

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	0.1979	6.7426	1.4662	0.0201	0.4821	0.0241	0.5062	0.1321	0.0230	0.1551		2,174.5910	2,174.5910	0.1425		2,178.1539
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	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.2620	6.7859	1.9447	0.0215	0.6274	0.0252	0.6526	0.1706	0.0241	0.1947		2,313.7384	2,313.7384	0.1465		2,317.4011

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					1.2936	0.0000	1.2936	0.1959	0.0000	0.1959			0.0000			0.0000
Off-Road	2.1262	20.9463	14.6573	0.0241		1.1525	1.1525		1.0761	1.0761	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363
Total	2.1262	20.9463	14.6573	0.0241	1.2936	1.1525	2.4461	0.1959	1.0761	1.2720	0.0000	2,322.3127	2,322.3127	0.5970		2,337.2363

AAA Parking Structure - South Coast AQMD Air District, Winter

3.2 Demolition - 2020

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	0.1979	6.7426	1.4662	0.0201	0.4821	0.0241	0.5062	0.1321	0.0230	0.1551		2,174.5910	2,174.5910	0.1425		2,178.1539
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	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.2620	6.7859	1.9447	0.0215	0.6274	0.0252	0.6526	0.1706	0.0241	0.1947		2,313.7384	2,313.7384	0.1465		2,317.4011

3.3 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					4.9566	0.0000	4.9566	2.5320	0.0000	2.5320			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296		1,365.7183	1,365.7183	0.4417		1,376.7609
Total	1.3498	15.0854	6.4543	0.0141	4.9566	0.6844	5.6410	2.5320	0.6296	3.1617		1,365.7183	1,365.7183	0.4417		1,376.7609

AAA Parking Structure - South Coast AQMD Air District, Winter

3.3 Grading - 2020

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	0.5750	19.5927	4.2605	0.0584	1.4009	0.0700	1.4708	0.3839	0.0670	0.4508		6,318.920 2	6,318.920 2	0.4141		6,329.273 4
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	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.6145	19.6193	4.5550	0.0593	1.4903	0.0707	1.5609	0.4076	0.0676	0.4752		6,404.549 4	6,404.549 4	0.4166		6,414.964 0

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					1.9331	0.0000	1.9331	0.9875	0.0000	0.9875			0.0000			0.0000
Off-Road	1.3498	15.0854	6.4543	0.0141		0.6844	0.6844		0.6296	0.6296	0.0000	1,365.718 3	1,365.718 3	0.4417		1,376.760 9
Total	1.3498	15.0854	6.4543	0.0141	1.9331	0.6844	2.6175	0.9875	0.6296	1.6171	0.0000	1,365.718 3	1,365.718 3	0.4417		1,376.760 9

AAA Parking Structure - South Coast AQMD Air District, Winter

3.3 Grading - 2020

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	0.5750	19.5927	4.2605	0.0584	1.4009	0.0700	1.4708	0.3839	0.0670	0.4508		6,318.920 2	6,318.920 2	0.4141		6,329.273 4
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	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.6145	19.6193	4.5550	0.0593	1.4903	0.0707	1.5609	0.4076	0.0676	0.4752		6,404.549 4	6,404.549 4	0.4166		6,414.964 0

3.4 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	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.159 5	2,001.159 5	0.3715		2,010.446 7
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688		2,001.159 5	2,001.159 5	0.3715		2,010.446 7

AAA Parking Structure - South Coast AQMD Air District, Winter

3.4 Building Construction - 2020

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	4.0600e-003	0.1384	0.0301	4.1000e-004	0.0305	4.9000e-004	0.0310	7.7700e-003	4.7000e-004	8.2400e-003		44.6474	44.6474	2.9300e-003		44.7206
Vendor	0.1135	3.4593	0.9193	8.2500e-003	0.2112	0.0174	0.2286	0.0608	0.0167	0.0775		879.4923	879.4923	0.0611		881.0190
Worker	0.4194	0.2831	3.1287	9.1300e-003	0.9501	7.2100e-003	0.9573	0.2520	6.6400e-003	0.2586		909.8102	909.8102	0.0261		910.4625
Total	0.5370	3.8808	4.0782	0.0178	1.1918	0.0251	1.2169	0.3205	0.0238	0.3443		1,833.9499	1,833.9499	0.0901		1,836.2021

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	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467
Total	2.0305	14.7882	13.1881	0.0220		0.7960	0.7960		0.7688	0.7688	0.0000	2,001.1595	2,001.1595	0.3715		2,010.4467

AAA Parking Structure - South Coast AQMD Air District, Winter

3.4 Building Construction - 2020

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	4.0600e-003	0.1384	0.0301	4.1000e-004	0.0305	4.9000e-004	0.0310	7.7700e-003	4.7000e-004	8.2400e-003		44.6474	44.6474	2.9300e-003		44.7206
Vendor	0.1135	3.4593	0.9193	8.2500e-003	0.2112	0.0174	0.2286	0.0608	0.0167	0.0775		879.4923	879.4923	0.0611		881.0190
Worker	0.4194	0.2831	3.1287	9.1300e-003	0.9501	7.2100e-003	0.9573	0.2520	6.6400e-003	0.2586		909.8102	909.8102	0.0261		910.4625
Total	0.5370	3.8808	4.0782	0.0178	1.1918	0.0251	1.2169	0.3205	0.0238	0.3443		1,833.9499	1,833.9499	0.0901		1,836.2021

3.4 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	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608		2,001.2200	2,001.2200	0.3573		2,010.1517
Total	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608		2,001.2200	2,001.2200	0.3573		2,010.1517

AAA Parking Structure - South Coast AQMD Air District, Winter

3.4 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.8900e-003	0.1279	0.0298	4.1000e-004	0.0126	4.4000e-004	0.0131	3.3800e-003	4.2000e-004	3.8000e-003		44.1735	44.1735	2.8900e-003		44.2458
Vendor	0.0967	3.1374	0.8358	8.1800e-003	0.2112	6.5400e-003	0.2178	0.0608	6.2600e-003	0.0671		873.0156	873.0156	0.0584		874.4759
Worker	0.3920	0.2547	2.8776	8.8300e-003	0.9501	6.9900e-003	0.9571	0.2520	6.4400e-003	0.2584		880.3177	880.3177	0.0236		880.9075
Total	0.4926	3.5200	3.7431	0.0174	1.1739	0.0140	1.1879	0.3162	0.0131	0.3293		1,797.5069	1,797.5069	0.0849		1,799.6292

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608	0.0000	2,001.2200	2,001.2200	0.3573		2,010.1517
Total	1.8125	13.6361	12.8994	0.0221		0.6843	0.6843		0.6608	0.6608	0.0000	2,001.2200	2,001.2200	0.3573		2,010.1517

AAA Parking Structure - South Coast AQMD Air District, Winter

3.4 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.8900e-003	0.1279	0.0298	4.1000e-004	0.0126	4.4000e-004	0.0131	3.3800e-003	4.2000e-004	3.8000e-003		44.1735	44.1735	2.8900e-003		44.2458
Vendor	0.0967	3.1374	0.8358	8.1800e-003	0.2112	6.5400e-003	0.2178	0.0608	6.2600e-003	0.0671		873.0156	873.0156	0.0584		874.4759
Worker	0.3920	0.2547	2.8776	8.8300e-003	0.9501	6.9900e-003	0.9571	0.2520	6.4400e-003	0.2584		880.3177	880.3177	0.0236		880.9075
Total	0.4926	3.5200	3.7431	0.0174	1.1739	0.0140	1.1879	0.3162	0.0131	0.3293		1,797.5069	1,797.5069	0.0849		1,799.6292

3.5 Paving - 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	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830		1,296.8664	1,296.8664	0.4111		1,307.1442
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830		1,296.8664	1,296.8664	0.4111		1,307.1442

AAA Parking Structure - South Coast AQMD Air District, Winter

3.5 Paving - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0600	0.0390	0.4401	1.3500e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		134.6368	134.6368	3.6100e-003		134.7270
Total	0.0600	0.0390	0.4401	1.3500e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		134.6368	134.6368	3.6100e-003		134.7270

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	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830	0.0000	1,296.8664	1,296.8664	0.4111		1,307.1442
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.7739	7.7422	8.8569	0.0135		0.4153	0.4153		0.3830	0.3830	0.0000	1,296.8664	1,296.8664	0.4111		1,307.1442

AAA Parking Structure - South Coast AQMD Air District, Winter

3.5 Paving - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0600	0.0390	0.4401	1.3500e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		134.6368	134.6368	3.6100e-003		134.7270
Total	0.0600	0.0390	0.4401	1.3500e-003	0.1453	1.0700e-003	0.1464	0.0385	9.9000e-004	0.0395		134.6368	134.6368	3.6100e-003		134.7270

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	3.7488					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	3.9677	1.5268	1.8176	2.9700e-003		0.0941	0.0941		0.0941	0.0941		281.4481	281.4481	0.0193		281.9309

AAA Parking Structure - South Coast AQMD Air District, Winter

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0784	0.0510	0.5755	1.7700e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		176.0635	176.0635	4.7200e-003		176.1815
Total	0.0784	0.0510	0.5755	1.7700e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		176.0635	176.0635	4.7200e-003		176.1815

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	3.7488					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	3.9677	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

AAA Parking Structure - South Coast AQMD Air District, Winter

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0784	0.0510	0.5755	1.7700e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		176.0635	176.0635	4.7200e-003		176.1815
Total	0.0784	0.0510	0.5755	1.7700e-003	0.1900	1.4000e-003	0.1914	0.0504	1.2900e-003	0.0517		176.0635	176.0635	4.7200e-003		176.1815

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

AAA Parking Structure - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unenclosed Parking with Elevator	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

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
Unenclosed Parking with	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
Unenclosed Parking with Elevator	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

5.0 Energy Detail

AAA Parking Structure - South Coast AQMD Air District, Winter

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	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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					
Unenclosed 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		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

AAA Parking Structure - South Coast AQMD Air District, Winter

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Unenclosed 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		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

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	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Unmitigated	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

AAA Parking Structure - South Coast AQMD Air District, Winter

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	0.0154					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0716					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.1800e-003	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Total	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

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	0.0154					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0716					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	7.1800e-003	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750
Total	0.0942	7.1000e-004	0.0769	1.0000e-005		2.7000e-004	2.7000e-004		2.7000e-004	2.7000e-004		0.1641	0.1641	4.4000e-004		0.1750

7.0 Water Detail

AAA Parking Structure - South Coast AQMD Air District, Winter

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

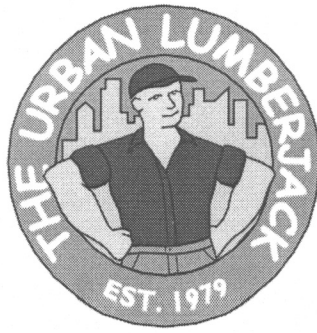
Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

APPENDIX B: TREE REPORT



2-7-2020

Tree report
640-700 West 27th Street
Los Angeles, CA

To Whom It May Concern:

INTRODUCTION

On Wednesday, January 15th, 2020 I was asked to visit the property located at 640-700 West 27th Street in downtown in Los Angeles, 90007 to identify, catalog and evaluate the existing trees on or adjacent to this property in order to prepare a Tree Report with Inventory as a component of the application for land use entitlements and building permits for this site. At present the property is occupied by a parking lot but the Automobile Club of Southern California, owner of the property, is seeking permission to erect a multi-level parking structure.

This report consists of 3 components – the text portion that you are reading, a Modified Site Plan showing the location of the trees and their driplines along with a letter designation identifying each individual tree and an Index of Trees that references the letter designation and details the DSH, spread, height and condition of each of these specimens.

DESCRIPTION

Once onsite I discovered that there are no trees on this lot and none on the adjacent lots close enough to be affected by the forthcoming construction.

There are, however, 10 mature City trees in cut-out planters adjacent the curb fronting on 27th street in front of this property. As 27th Street runs east-to-west, this places these trees to the north of this parking lot.

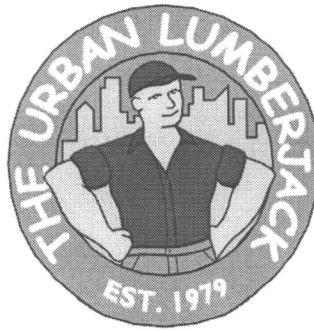
All 10 are Carob trees (*Ceratonia siliqua*) of the same antiquity. 5 are robust and thriving, one is robust but cavitated and has a hive of bees resident at near-grade level, 2 may be described as being in adequate condition and 2 are struggling. Several have cracked and lifted the adjacent sidewalk as is common with this species in its maturity. Only two show visible evidence of the interior decay that is another all too common event with mature Carobs. All of the specimens are growing their crowns preferentially towards the south, that is towards the area of future construction.

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ISA Certified Arborist
WE-8830A





Tree report
640-700 West 27th Street
Los Angeles, CA 90007

DISCUSSION

The forthcoming construction of the building itself will have no impact on this stand of trees with the exception of a single specimen (TREE I) which will have to be removed to permit construction of the egress driveway, more on this below.

The excavation for the building's foundation will occur 25' back from the northern edge of the property, a property edge which is itself separated from the trees by the additional 10 feet of the sidewalk. The building will feature some decorative arches in front of the structure but these are to be built atop small footings and their modest diameters coupled with their distance from the trunks means that they will likewise offer no insult to the existing tree roots.

The existing low wall and parking lot are to be demolished and this area will constitute the staging area for the forthcoming construction. However, the percentage of the City trees' driplines that extends above the existing parking lot where the process of construction will take place is under 20% so any damage to the roots by compaction and other construction-related events will be insignificant to these trees.

The phototropic growth of the canopies has weighted these trees towards the south – were one to sever any of these trees at near the grade level, it would topple towards the parking lot. This means that the tension roots essential to maintaining these trees in an upright posture are to be found under 27th Street to the north of their trunks, on the side away from the construction.

Therefore, it is reasonable to conclude that the forthcoming construction project should have no measurable negative impact on these trees.

But a close examination of the Modified Site Plan will reveal that the projected egress driveway on the western side of this property comes within one foot (12") of the trunk of TREE I.

Therefore, of the 10 City trees in front of this property, only one - TREE I - would need to be removed to permit the construction project to move forward.

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Page 3

Tree report
640-700 West 27th Street
Los Angeles, CA 90007

CONCLUSIONS

The loss of TREE I is inevitable but that may be a moot point. As mentioned earlier in this report, the roots belonging to these 10 trees have broken the sidewalk and raised it in places throughout the front of this property.

I believe it is likely that some or all of these trees would be condemned to removal before the project is completed in order to repour the sidewalk.

Such a decision would arise from conversations between the City and the developer and is beyond the scope of this report but will want to be factored into future considerations regarding these 10 trees and their fate.

Please get in touch if may provide any additional information and thanks for your attention to this matter.

Sincerely yours,

Steve Marshall
ISA Certified Arborist
Member, American Society of Consulting Arborists
The Urban Lumberjack LLC
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INDEX OF TREES

Please note – dimensions of canopy spread are only approximately in the cardinal directions of their category and represent the widest spread in those general directions.

Index Letter	Species	DBH	Height	Spread North/South	Spread East/West	Notes on Condition
A	Carob <i>Ceratonia siliqua</i>	20.9"	19'	37'	32'	Thriving.
B	Carob <i>Ceratonia siliqua</i>	19.1"	18'	34'	29'	Struggling – dramatic street-side dieback.
C	Carob <i>Ceratonia siliqua</i>	16.0"	15'	27'	25'	Adequate.
D	Carob <i>Ceratonia siliqua</i>	17.9"	16'	28'	26'	Compact but thriving.
E	Carob <i>Ceratonia siliqua</i>	21.3	17'	36'	39'	Thriving.
F	Carob <i>Ceratonia siliqua</i>	17.5"	17'	33'	30'	Adequate.
G	Carob <i>Ceratonia siliqua</i>	15.9"	13'	23'	27'	Struggling. Anemic, yellowish. Cavitated trunk at grade level.

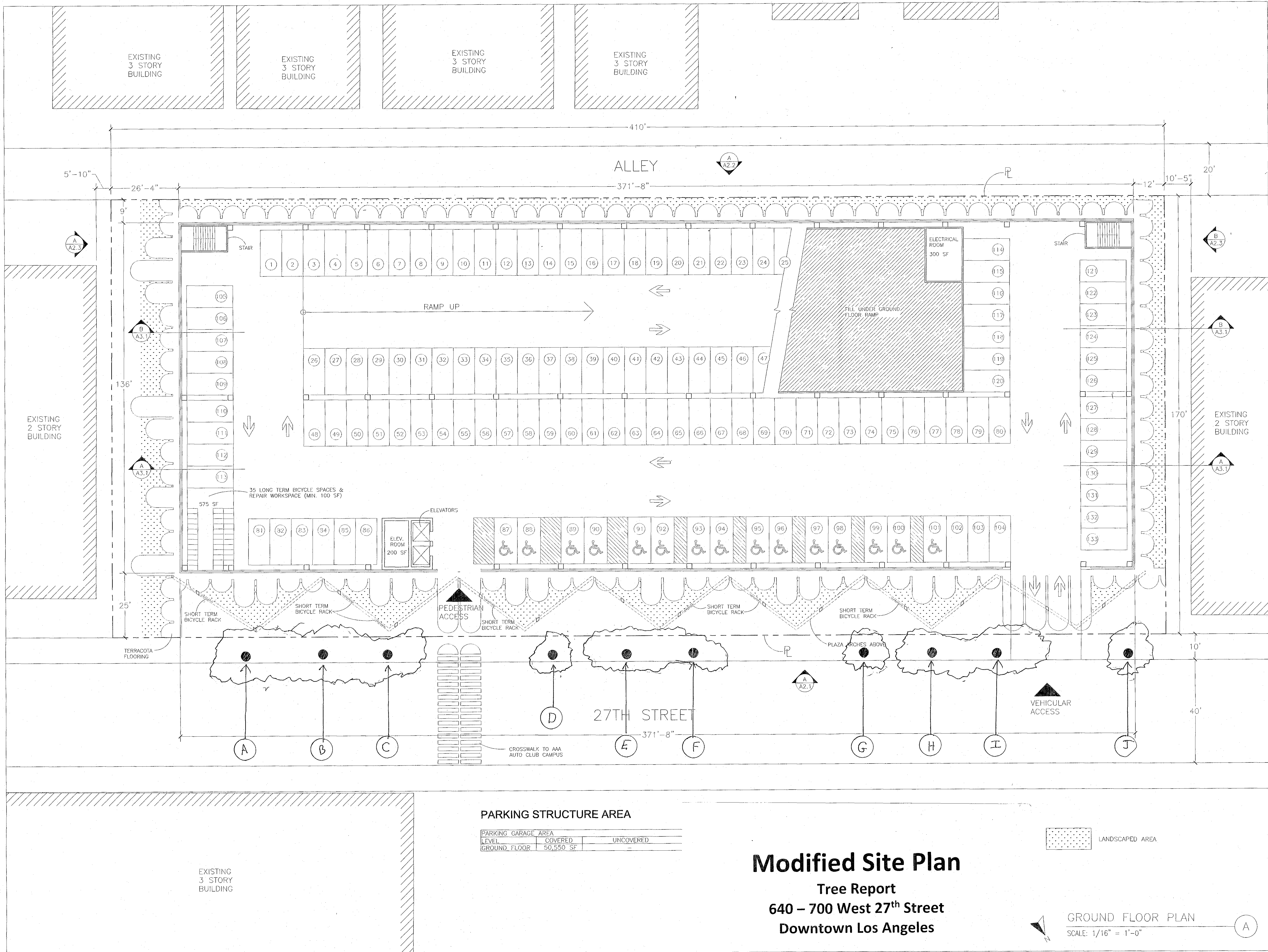
PROPERTY ADDRESS 640 - 700 West 27th Street Los Angeles, CA 90007

INDEX OF TREES

PAGE 2 of 2

Please note - dimensions of canopy spread are only approximately in the cardinal directions of their category and represent the widest spread in those general directions.

Index Letter	Species	DBH	Height	Spread North/South	Spread East/West	Notes on Condition
H	Carob <i>Ceratonia siliqua</i>	21.3"	16'	39'	32'	Thriving
I	Carob <i>Ceratonia siliqua</i>	22.8"	17'	37'	39'	Thriving
J	Carob <i>Ceratonia siliqua</i>	18.8"	16'	30'	38'	Crown is thriving. Hive of bees present and active near grade level. A large but old and dried conk was observed on the west side of the trunk, probably <i>Ganoderma</i> sp.



PARKING STRUCTURE AREA

PARKING GARAGE AREA		
LEVEL	COVERED	UNCOVERED
GROUND FLOOR	50,550 SF	-

LANDSCAPED AREA

Modified Site Plan
Tree Report
640 - 700 West 27th Street
Downtown Los Angeles

GROUND FLOOR PLAN
 SCALE: 1/16" = 1'-0"

OWNER:
ACSC Management Services, Inc.
 2601 S. FIGUEROA STREET
 LOS ANGELES, CA 90007

ARCHITECT:

 1340 E 6TH STREET, 303
 LOS ANGELES, CA 90021
 213 232 1606

STRUCTURAL:

ENTITLEMENT SET

PROJECT RECORD	DATE	DESCRIPTION	REV.
	10/22/2019	PLANNING SUBMITTAL	

PROJECT NAME:
AAA Parking Structure
 PROJECT LOCATION:
**640-700 W. 27TH STREET,
 LOS ANGELES, CA 90007**

SHEET TITLE:
GROUND FLOOR PLAN

SHEET NUMBER:

A1.2

APPENDIX C: GEOTECHNICAL INVESTIGATION

VAN AMBATIELOS
PRESIDENT

JAVIER NUNEZ
VICE PRESIDENT

JOSELYN GEAGA-ROSENTHAL
GEORGE HOVAGUIMIAN
ELVIN W. MOON



ERIC GARCETTI
MAYOR

OSAMA YOUNAN, P.E.
GENERAL MANAGER
SUPERINTENDENT OF BUILDING

GEOLOGY AND SOILS REPORT APPROVAL LETTER

July 23, 2020

LOG # 113091-01
SOILS/GEOLOGY FILE - 2

ACSC Management Services, Inc.
2601 Figueroa Street
Los Angeles, CA 90007

TRACT: DEL VALLE'S SUBDIVISION OF PART OF THE WHEELER TRACT
(MR 30-3)
LOT(S): Lot 10 (Arb-1), 11 (Arb-1), 11 (Arb-2), 12, 13, 14, 15, 16
LOCATION: 640 - 700 W. 27th Street

<u>CURRENT REFERENCE</u>	<u>REPORT</u>	<u>DATE OF</u>	<u>PREPARED BY</u>
<u>REPORT/LETTER(S)</u>	<u>No.</u>	<u>DOCUMENT</u>	
Geology/Soils Report	2001-03-B-2	06/09/2020	Advanced Geotechnical Solutions

<u>PREVIOUS REFERENCE</u>	<u>REPORT</u>	<u>DATE OF</u>	<u>PREPARED BY</u>
<u>REPORT/LETTER(S)</u>	<u>No.</u>	<u>DOCUMENT</u>	
Dept. Review Letter	113091	05/20/2020	LADBS – Grading
Geology/Soils Report	2001-03-B-2	03/10/2020	Advanced Geotechnical Solutions
Laboratory Test Report	10-135752	03/10/2020	Construction Testing & Engineering

The Grading Division of the Department of Building and Safety has reviewed the referenced reports dated June 9, 2020, and March 10, 2020, that provides recommendations for the proposed multi-level, 4 1/2 stories high on grade parking structure, as depicted on Plate 1: Geotechnical Map and Plate 2: Geologic Cross Section A-A' of the referenced report. The subject site is approximately 69,731 square feet, currently occupied by an asphalt driveway. The structure is proposed to be 202,200 square feet, approximately 48 feet high, and with up to 750 parking spaces.

Proposed retaining walls will support compacted fill for the parking garage ramp that travels from the first level (at-grade) to the second level.

The subject site is essentially flat with elevations ranging from approximately 199 ft. (Above mean sea level in feet) msl. to 201 ft. msl. The consultants excavated 4 hollow stem auger borings ranging in depth from 18.5 feet to 51.5 feet below ground surface. The earth materials at the subsurface exploration locations consist of up to 6-inches of asphalt concrete that comprises the parking lot surface, with underlying uncertified fill up to 4.5 feet thick. The uncertified fill was underlain by natural alluvium ranging in thickness from 7 to 8 feet thick. Underlying the alluvium is older alluvium encountered to the maximum depth explored of 51.5 feet. Groundwater was not encountered to the maximum depth explored of 51.5 feet. The consultants researched historic high

groundwater for the subject site and was found to be 60 feet below the ground surface. The consultants note that groundwater was recently measured to depths exceeding 200 feet in the vicinity of the subject site.

The consultants recommend to support the proposed structure(s) on conventional spread footings or mat foundation bearing on a blanket of properly placed fill.

As of January 1, 2020, the City of Los Angeles has adopted the new 2020 Los Angeles Building Code (LABC). The 2020 LABC requirements will apply to all projects where the permit application submittal date is after January 1, 2020.

The referenced reports dated June 9, 2020, and March 20, 2020, are acceptable, provided the following conditions are complied with during site development:

(Note: Numbers in parenthesis () refer to applicable sections of the 2020 City of LA Building Code. P/BC numbers refer the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

1. The geologist and soils engineer shall review and approve the detailed plans prior to issuance of any permits. This approval shall be by signature on the plans that clearly indicates the geologist and soils engineer have reviewed the plans prepared by the design engineer; and, that the plans include the recommendations contained in their reports (7006.1).
2. All recommendations of the report(s) that are in addition to or more restrictive than the conditions contained herein shall be incorporated into the plans.
3. A copy of the subject and appropriate referenced reports and this approval letter shall be attached to the District Office and field set of plans (7006.1). Submit one copy of the above reports to the Building Department Plan Checker prior to issuance of the permit.
4. A grading permit shall be obtained for all structural fill and retaining wall backfill (106.1.2).
5. All man-made fill shall be compacted to a minimum 90 percent of the maximum dry density of the fill material per the latest version of ASTM D 1557. Where cohesionless soil having less than 15 percent finer than 0.005 millimeters is used for fill, it shall be compacted to a minimum of 95 percent relative compaction based on maximum dry density. Placement of gravel in lieu of compacted fill is only allowed if complying with LAMC Section 91.7011.3.
6. If import soils are used, no footings shall be poured until the soils engineer has submitted a compaction report containing in-place shear test data and settlement data to the Grading Division of the Department; and, obtained approval (7008.2).
7. Compacted fill shall extend beyond the footings a minimum distance equal to the depth of the fill below the bottom of footings or a minimum of three feet whichever is greater, except at locations where lateral over excavation is not possible (i.e., foundations adjacent to property lines or structures), in which case the foundations may be deepened to bear in native soils. (7011.3).

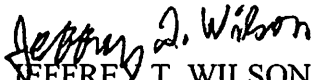
8. Existing uncertified fill shall not be used for support of footings, concrete slabs or new fill (1809.2, 7011.3).
9. Drainage in conformance with the provisions of the Code shall be maintained during and subsequent to construction (7013.12).
10. Grading shall be scheduled for completion prior to the start of the rainy season, or detailed temporary erosion control plans shall be filed in a manner satisfactory to the Grading Division of the Department and the Department of Public Works, Bureau of Engineering, B-Permit Section, for any grading work in excess of 200 cubic yards (7007.1).


201 N. Figueroa Street 3rd Floor, LA (213) 482-7045

11. All loose foundation excavation material shall be removed prior to commencement of framing. Slopes disturbed by construction activities shall be restored (7005.3).
12. The applicant is advised that the approval of this report does not waive the requirements for excavations contained in the General Safety Orders of the California Department of Industrial Relations (3301.1).
13. Excavations shall not remove lateral support from a public way, adjacent property or an existing structure. Note: Lateral support shall be considered to be removed when the excavation extends below a plane projected downward at an angle of 45 degrees from the bottom of a footing of an existing structure, from the edge of the public way or an adjacent property. (3307.3.1)
14. Where any excavation, not addressed in the approved reports, would remove lateral support (as defined in 3307.3.1) from a public way, adjacent property or structures, a supplemental report shall be submitted to the Grading Division of the Department containing recommendations for shoring, underpinning, and sequence of construction. Shoring recommendations shall include the maximum allowable lateral deflection of shoring system to prevent damage to adjacent structures, properties and/or public ways.
15. Prior to the issuance of the permits, the soils engineer and/or the structural designer shall evaluate the surcharge loads used in the report calculations for the design of the retaining walls and shoring. If the surcharge loads used in the calculations do not conform to the actual surcharge loads, the soil engineer shall submit a supplementary report with revised recommendations to the Department for approval.
16. Unsurcharged temporary excavations over 5 feet exposing soil shall be trimmed back at a gradient not exceeding 1.5(H):1(V), as recommended.
17. All foundations shall derive entire support from a blanket of properly placed engineered certified compacted fill, a minimum thickness of 5 feet below ground surface or a minimum of 3 feet below the bottom of the footing, as recommended and approved by the geologist and soils engineer by inspection.
18. Slabs on uncertified fill shall be designed as a structural slab (7011.3).
19. Slabs for vehicles placed on approved compacted fill shall be at least 4 inches thick, as recommended. Vapor barriers shall be utilized as recommended.

20. Proposed over excavations shall be a minimum of 5 feet below the proposed structure or a minimum of 3 feet below the bottom of the foundation element, whichever is deeper, as recommended.
21. Pavement areas out side of the proposed structure shall be overexcavated to provide a minimum thickness of 2 feet of certified compacted artificial fill, as recommended.
22. The seismic design shall be based on a Site Class D, as recommended. According to ASCE 7-16 Section 11.4.8, for Site Class D with $S_1 \geq 0.2$, the long period coefficient (F_v) may be selected per Table 11.4-2, ASCE 7-16, provided that the value of the Seismic Response Coefficient (C_s) is determined by Equation 12.8-2 for values of the fundamental period of the building (T) $T \leq 1.5T_s$, and taken as 1.5 times the value computed in accordance with Equation 12.8-3 for $T_L \geq 1.5T_s > T_L$ or Equation 12.8-4 for $T > T_L$. All other seismic design parameters shall be reviewed by LADBS building plan check.
23. The seismic design shall be based on a Site Class D utilizing seismic parameters obtained from either the Code response spectra or the site-specific response spectra presented in the 06/09/2020 report.
24. Retaining walls with a level backfill shall be designed for a minimum equivalent fluid pressure (EFP) as specified on pages 7 and 8 of the June 9, 2020, referenced report. The recommendations are applicable to on-site backfill material or import earth materials having a friction angle of minimum 34 degrees. All surcharge loads shall be incorporated into the design.
25. Retaining walls higher than 6 feet shall be designed for lateral earth pressure due to earthquake motions as specified on page 7 of the June 9, 2020, referenced report (1803.5.12).
26. All retaining walls shall be provided with a standard surface backdrain system and all drainage shall be conducted in a non-erosive device to the street in an acceptable manner (7013.11).
27. With the exception of retaining walls designed for hydrostatic pressure, all retaining walls shall be provided with a subdrain system to prevent possible hydrostatic pressure behind the wall. Prior to issuance of any permit, the retaining wall subdrain system recommended in the soils report shall be incorporated into the foundation plan which shall be reviewed and approved by the soils engineer of record (1805.4).
28. Installation of the subdrain system shall be inspected and approved by the soils engineer of record and the City grading/building inspector (108.9).
29. Prefabricated drainage composites (Miradrain, Geotextiles) may be only used in addition to traditionally accepted methods of draining retained earth.
30. All roof, pad and driveway drainage shall be conducted to the street in an acceptable manner in non-erosive devices or other approved location in a manner that is acceptable to the LADBS and the Department of Public Works (7013.10).
31. All concentrated drainage shall be conducted in an approved device and disposed of in a manner approved by the LADBS (7013.10).

32. Sprinkler plans for irrigation shall be submitted and approved by the Mechanical Plan Check Section (7012.3.1).
33. Any recommendations prepared by the geologist and/or the soils engineer for correction of geological hazards found during grading shall be submitted to the Grading Division of the Department for approval prior to use in the field (7008.2, 7008.3).
34. The geologist and soils engineer shall inspect all excavations to determine that conditions anticipated in the report have been encountered and to provide recommendations for the correction of hazards found during grading (7008, 1705.6 & 1705.8).
35. Prior to pouring concrete, a representative of the consulting soils engineer shall inspect and approve the footing excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the work inspected meets the conditions of the report. No concrete shall be poured until the LADBS Inspector has also inspected and approved the footing excavations. A written certification to this effect shall be filed with the Grading Division of the Department upon completion of the work. (108.9 & 7008.2)
36. Prior to excavation an initial inspection shall be called with the LADBS Inspector. During the initial inspection, the sequence of construction; protection fences; and, dust and traffic control will be scheduled (108.9.1).
37. Prior to the placing of compacted fill, a representative of the soils engineer shall inspect and approve the bottom excavations. The representative shall post a notice on the job site for the LADBS Inspector and the Contractor stating that the soil inspected meets the conditions of the report. No fill shall be placed until the LADBS Inspector has also inspected and approved the bottom excavations. A written certification to this effect shall be included in the final compaction report filed with the Grading Division of the Department. All fill shall be placed under the inspection and approval of the soils engineer. A compaction report together with the approved soil report and Department approval letter shall be submitted to the Grading Division of the Department upon completion of the compaction. In addition, an Engineer's Certificate of Compliance with the legal description as indicated in the grading permit and the permit number shall be included (7011.3).
38. No footing/slab shall be poured until the compaction report is submitted and approved by the Grading Division of the Department.


JEFFREY T. WILSON
Engineering Geologist I


DAN L. STOICA
Geotechnical Engineer I

JTW/DLS:jtw/dls
Log No. 113091-01
213-482-0480

cc: Sheppard, Mullin, Richter, and Hampton, LLC
Advanced Geotechnical Solutions, Project Consultant
LA District Office

APPLICATION FOR REVIEW OF TECHNICAL REPORTS

INSTRUCTIONS

- A. Address all communications to the Grading Division, LADBS, 221 N. Figueroa St., 12th Fl., Los Angeles, CA 90012
Telephone No. (213)482-0480.
- B. Submit two copies (three for subdivisions) of reports, one "pdf" copy of the report on a CD-Rom or flash drive,
and one copy of application with items "1" through "10" completed.
- C. Check should be made to the City of Los Angeles.

<p>1. LEGAL DESCRIPTION <u>(MR 30-3)</u> Tract: <u>Del Valle's Subdivision of Part of the Wheeler Tract</u> Block: _____ Lots: <u>10-16 (arbl-2)</u></p> <p>3. OWNER: <u>ASCE Management Services, Inc.</u> Address: <u>2601 S. Figueroa Street</u> City: <u>Los Angeles</u> Zip: <u>90007</u> Phone (Daytime): <u>714-885-2520</u></p>	<p>2. PROJECT ADDRESS: <u>640-700 West 27th Street</u></p> <p>4. APPLICANT <u>Sheppard Mullin Richter and Hampton LLP</u> Address: <u>333 S. Hope Street, 43rd Floor</u> City: <u>Los Angeles</u> Zip: <u>90071</u> Phone (Daytime): <u>213-617-4101</u> E-mail address: <u>afrajo@sheppardmullin.com; jmaramas@sheppardmullin.com</u></p>
--	--

<p>5. Report(s) Prepared by: Advanced Geotechnical Services, Inc.</p>	<p>6. Report Date(s): June 9, 2020</p>
--	---

7. Status of project: Proposed Under Construction Storm Damage

8. Previous site reports? YES if yes, give date(s) of report(s) and name of company who prepared report(s)
3-10-2020 (Advanced Geotechnical Solutions, Inc.)

9. Previous Department actions? YES if yes, provide dates and attach a copy to expedite processing.
 Dates: 5-20-2020 (Geology and Soils Report Review Letter), Log # 113091

10. Applicant Signature: _____ **Position:** Partner

(DEPARTMENT USE ONLY)

REVIEW REQUESTED	FEES	REVIEW REQUESTED	FEES
<input type="checkbox"/> Soils Engineering		No. of Lots	
<input type="checkbox"/> Geology		No. of Acres	
<input type="checkbox"/> Combined Soils Engr. & Geol.		<input type="checkbox"/> Division of Land	
<input type="checkbox"/> Supplemental		Other	
<input checked="" type="checkbox"/> Combined Supplemental	<u>363.00</u>	<input checked="" type="checkbox"/> Expedite	<u>181.50</u>
<input type="checkbox"/> Import-Export Route		<input type="checkbox"/> Response to Correction	
Cubic Yards: _____		<input type="checkbox"/> Expedite ONLY	
		Sub-total	<u>544.50</u>
		Surcharge	<u>129.80</u>
		TOTAL FEE	<u>674.30</u>

Fee Due: 674.30
 Fee Verified By: ml Date: 6/29/20
 (Cashier Use Only)

ACTION BY:

THE REPORT IS: NOT APPROVED

APPROVED WITH CONDITIONS BELOW ATTACHED

For Geology	For Soils	Date	Date
		SYSTEMS DEV SURCH	\$10.89
		GEN PLAN MAINT SURCH	\$12.71
		DEV SERV CENTER SURCH	\$5.43
		CITY PLAN SURCH	\$10.89
		MISCELLANEOUS	\$10.00
			\$674.30
		TOTAL	

LA Department of Building and Safety
 LA ADIM 109009778 6/30/20
 20 8:17:06 AM

 GRADING REPORT
 \$363.00
 SYSTEMS DEV SURCH
 \$21.78
 GEN PLAN MAINT SURCH
 \$25.41
 DEV SERV CENTER SURCH
 \$10.89
 CITY PLAN SURCH
 \$21.78
 DIRM APPROVAL FEE
 \$10.89
 SYSTEMS DEV SURCH
 \$10.89
 GEN PLAN MAINT SURCH
 \$12.71
 DEV SERV CENTER SURCH
 \$5.43
 CITY PLAN SURCH
 \$10.89
 MISCELLANEOUS
 \$10.00
 \$674.30
 SUB TOTAL



AGS

ADVANCED GEOTECHNICAL SOLUTIONS, INC.

485 Corporate Drive, Suite B

Escondido, California 92029

Telephone: (619) 867-0487 Fax: (714) 409-3287

Automobile Club of Southern California

3333 Fairview Road- A479
Costa Mesa, California 92626

March 10, 2020

P/W 2001-03

Report No. 2001-03-B-2

**Attention: Ms. Jena Miller
c/o Mr. Yue Shi
Shepard Mullin
333 South Hope Street, 43rd Floor
Los Angeles, CA 90071-1422**

Subject: *Geotechnical Investigation, Proposed Parking Structure, 640-700 West 27th Street, Los Angeles, California*

References: See Appendix A

Gentlemen:

Presented herein are the results of Advanced Geotechnical Solutions, Inc.'s, (AGS's) geotechnical investigation for the proposed parking structure located at 640-700 West 27th Street in the City of Los Angeles, California. The purpose of this geotechnical investigation is to evaluate the proposed development relative to the near-site and on-site geologic and geotechnical conditions, as well as to provide conclusions and recommendations to aid in the construction of the proposed foundation and improvements.

Advanced Geotechnical Solutions, Inc., appreciates the opportunity to provide you with geotechnical consulting services and professional opinions. If you have any questions, please contact the undersigned at (714) 786-5661.

Respectfully Submitted,
Advanced Geotechnical Solutions, Inc.

JOHN J. DONOVAN
RCE 65051, RGE 2790, Reg. Exp. 6-30-21

PAUL J. DERISI
CEG 2536, Reg. Exp. 5-31-21



Distribution: (1) Addressee (pdf)

2001-03-B-2 (Mar 10, 2020, Prelim, 640 W 27th Parking Garage).docx

ORANGE AND L.A. COUNTIES
(714) 786-5661

INLAND EMPIRE
(619) 867-0487

SAN DIEGO AND IMPERIAL COUNTIES
(619) 867-0487

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ATTACHMENTS:

FIGURE 1-	SITE MAP
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***GEOTECHNICAL INVESTIGATION
PROPOSED PARKING STRUCTURE
640-700 WEST 27th STREET, LOS ANGELES, CALIFORNIA***

1.0 INTRODUCTION

Advanced Geotechnical Solutions, Inc., (AGS) has prepared this report which presents the results of our geotechnical investigation onsite, and provides specific recommendations for the design and construction of the proposed parking garage to be located at 640-700 West 27th Street in Los Angeles, California.

1.1. Scope of Work

The scope of our study included the following tasks:

- Review of pertinent published and unpublished geologic and geotechnical literature, maps, and aerial photographs readily available to this firm.
- Prepare a geotechnical map depicting the site conditions (Plate 1).
- Prepare a geologic cross section depicting geologic conditions and proposed improvements (Plate 2).
- Advancing, logging, and sampling four hollow stem auger borings to depths ranging from 18.5 to 51.5 feet. The boring logs are presented in Appendix B.
- Conducting laboratory testing on the collected soil samples to evaluate the engineering properties of the subsurface materials. Laboratory results are presented in Appendix C.
- Conducting a geotechnical engineering and geologic hazard analysis of the site.
- Evaluating groundwater conditions and the potential effects on construction.
- Conducting a limited seismic hazards evaluation including research of readily available published maps and reports.
- Determining design parameters for foundations.
- Providing a preliminary corrosivity evaluation of the onsite soils.
- Preparing this report with exhibits summarizing our findings. This report would be suitable for design, construction, and regulatory review.

1.2. Geotechnical Study Limitations

The conclusions and recommendations in this report are professional opinions based on the data developed during this investigation. The conclusions presented herein are based upon the current design concept (multi-level parking garage constructed at grade). Changes to the design concept would necessitate further review.

The materials immediately adjacent to or beneath those observed may have different characteristics than those observed. No representations are made as to the quality or extent of

materials not observed. Any evaluation regarding the presence or absence of hazardous material is beyond the scope of this firm's services.

2.0 SITE AND PROJECT DESCRIPTION

2.1. Site Description

The site is located on West 27th Street near South Figueroa Street and is surrounded by residences to the south, and west, and a combination of residential and commercial uses to the east. The site is bound by 27th Street to the north and an alley way to the south and covers an area of approximately 69,731-square-feet. The AAA headquarters is located north of the site at 2601 South Figueroa Street.

The site is currently occupied by an asphalt paved on-grade parking lot. The site is generally flat with elevations onsite ranging from approximately 199 msl to 201 msl (See Figure 1, Site Map). Historic aerial imagery (1948, 1952, 1964, and post 1972) indicates that numerous structures were present on the site in 1948, 1952, and 1964. Several trees were also present. By 1972, a parking lot had been constructed across the site, and no obvious visible changes were observed on the site since 1972.

2.2. Project Description

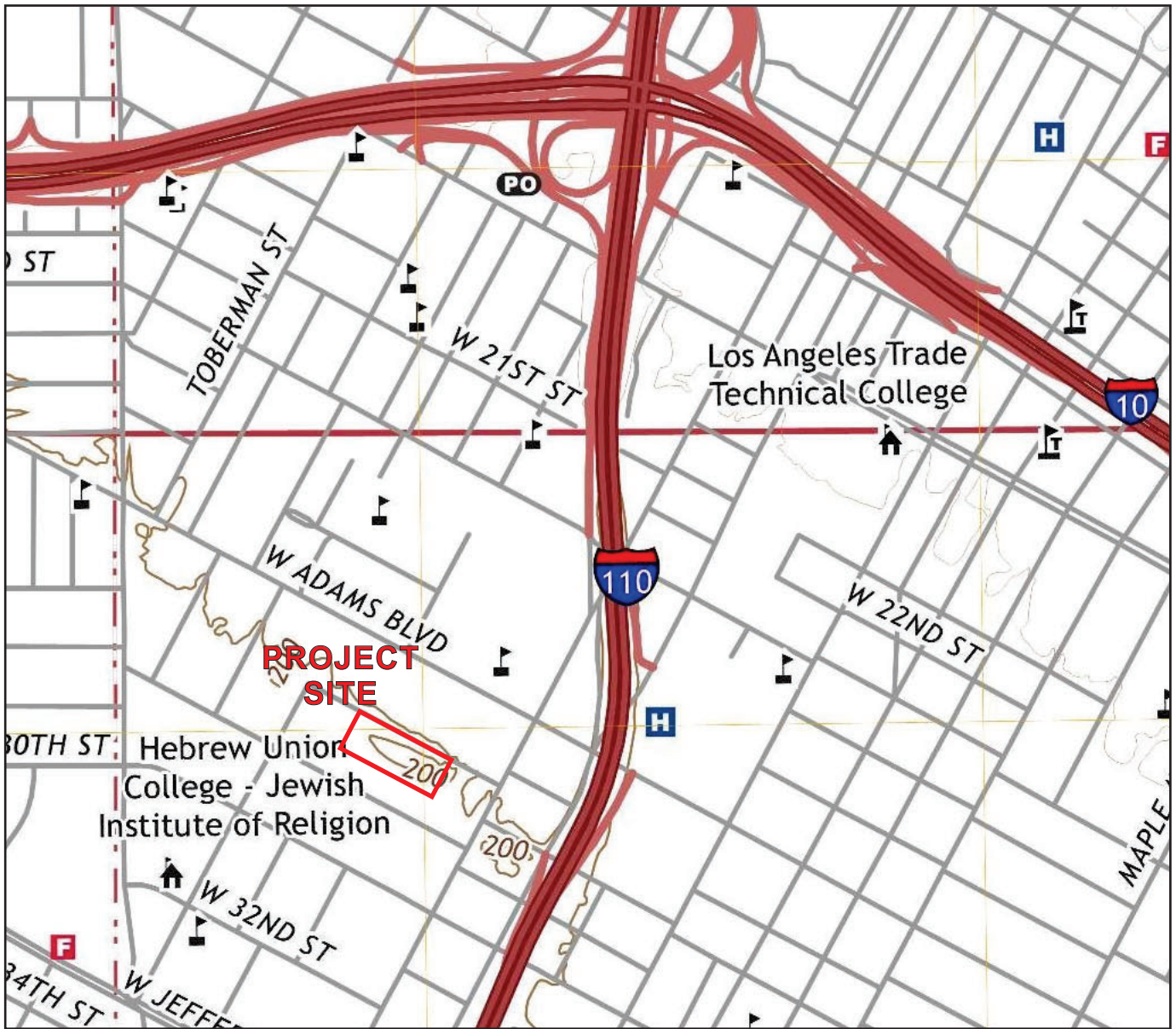
The project consists of construction of a 202,200 sq.ft. four and one half-story on-grade parking structure with up to 750 parking spaces. The structure is anticipated to consist of post-tensioned concrete construction with a shallow foundation system.

3.0 FIELD AND LABORATORY INVESTIGATION

3.1. Current Investigation

Four hollow-stem auger soil borings were excavated onsite, logged, and sampled by a representative of this firm. The borings were excavated to a maximum depth of 51.5 feet below ground surface. Boring logs are presented in Appendix B. The boring locations are shown on Plate 1, which utilize the architectural site plan as a base.

Representative bulk and "undisturbed" ring samples were delivered to Construction Testing and Engineering, Inc., in Escondido (City of Los Angeles TA#10041) for laboratory testing. Their test report is included in Appendix C. Testing included in-situ moisture content and density, shear strength, maximum density and optimum moisture content, gradation, expansion potential, and chemical/corrosivity analysis. AGS has reviewed the data presented in the test report and found the data to be reasonable. AGS herein accepts the data and finds the data acceptable to use for the analysis presented herein.



SITE LOCATION MAP
PROPOSED AAA PARKING STRUCTURE
640-700 W. 27th STREET,
LOS ANGELES, CALIFORNIA

N

 SCALE 1:12,000

P/W 2001-03

FIGURE 1

SOURCE MAP - U.S.G.S. TOPOGRAPHIC MAP OF THE
 HOLLYWOOD 7.5 MINUTE QUADRANGLE,
 LOS ANGELES COUNTY, CALIFORNIA (2018)

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4.0 ENGINEERING GEOLOGY

4.1. Geologic Analysis

4.1.1. Literature Review

AGS has reviewed the referenced geologic documents in preparing this study. Where deemed appropriate, this information has been included with this document.

4.1.2. Aerial Photograph and Historic U.S.G.S. Map Review

AGS has reviewed the aerial photographs available online and in our library as well as historic U.S.G.S. quadrangle maps.

4.1.3. Field Mapping

A site reconnaissance was conducted at the site and its immediate vicinity.

4.2. Geologic and Geomorphic Setting

The subject property is located within the Los Angeles physiographic basin, an alluvial lowland in the northwest region of the Peninsula Ranges geomorphic province. This basin is bounded on the north by the Santa Monica Mountains; to the east by the Elysian, Repetto and Puente Hills; and on the southeast by the Santa Ana Mountains and San Joaquin Hills (Yerks 1965). The region is underlain by Cretaceous to Pliocene sediments which are mantled by quaternary deposits. Structurally, the basin is characterized by northwest trending fold structures and faults (e.g. Whittier-Elsinore, Newport-Inglewood). Locally, the site overlies interbedded and lenticular sands and gravels which were laid down as alluvial/ floodplain deposits.

Specifically the site is located within the northern boundary of the Central Block of the basin.

4.3. Stratigraphy

The site vicinity has been mapped as Holocene age Quaternary sediments associated with flood plain deposits (Figure 2). AGS encountered these sediments during our investigation at the site. A description of the geologic units encountered is provided below.

4.3.1. Artificial Fill-undocumented

Undocumented artificial fill exists within the upper few feet at the site and may have been associated with original grading operations to construct the parking lot. The fill material was observed to be silty sand that slightly moist and loose.

4.3.2. Alluvium

Holocene age alluvial deposits were encountered at the site below the artificial fill. This unit was observed to be sand with gravel and varying amounts of silt. This material was dry to slightly moist and with a consistency that varied from medium dense to very dense.



REGIONAL GEOLOGIC MAP
PROPOSED AAA PARKING STRUCTURE
640-700 W. 27th STREET,
LOS ANGELES, CALIFORNIA

Qa Alluvium: clay, sand and gravel; includes gravel and sand of minor stream channels (Holocene)

P/W 2001-03

FIGURE 2

SOURCE MAP - GEOLOGIC MAP OF THE HOLLYWOOD
 AND BURBANK (south 1/2) QUADRANGLES, LOS
 ANGELES, CALIFORNIA: DIBBLE, T.W., AND
 EHRENSPECK, H.E., (1991)



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4.3.3. Older Alluvium

Pleistocene age old alluvial fan deposits were encountered within all four borings advanced at the site. This unit was observed to consist of coarse-grained materials with varying amounts of gravel and silt. These deposits were observed to be dense to very dense.

4.4. Regional Faulting

The major active faults in the region are the Puente Hills blind thrust fault (1.9 miles to the southwest), Elysian Park (4.1 miles to the northeast), the Newport-Inglewood Structural zone (5 miles to the west-southwest), and the Hollywood Fault north of the site (See Figure 3, Fault Map). No faults have been mapped on the site.

4.5. Groundwater

Static groundwater or groundwater seepage was not encountered during our subsurface investigation. According to information presented in the "Seismic Hazard Zone Report for the Hollywood 7.5-minute Quadrangle", historical high groundwater depths on the site are on the order of 60 feet. The groundwater level has been recently measured at depths exceeding 200 feet in the vicinity of the site. Groundwater is not expected to impact the proposed construction.

4.6. Non-seismic Geologic Hazards

4.6.1. Mass Wasting and Debris Flows

Due to the relatively flat developed nature of the site area, mass wasting and debris flows are not considered a geologic hazard to the site.

4.6.2. Subsidence and Ground Fissuring

The site is not located within an area identified as having a potential for subsidence.

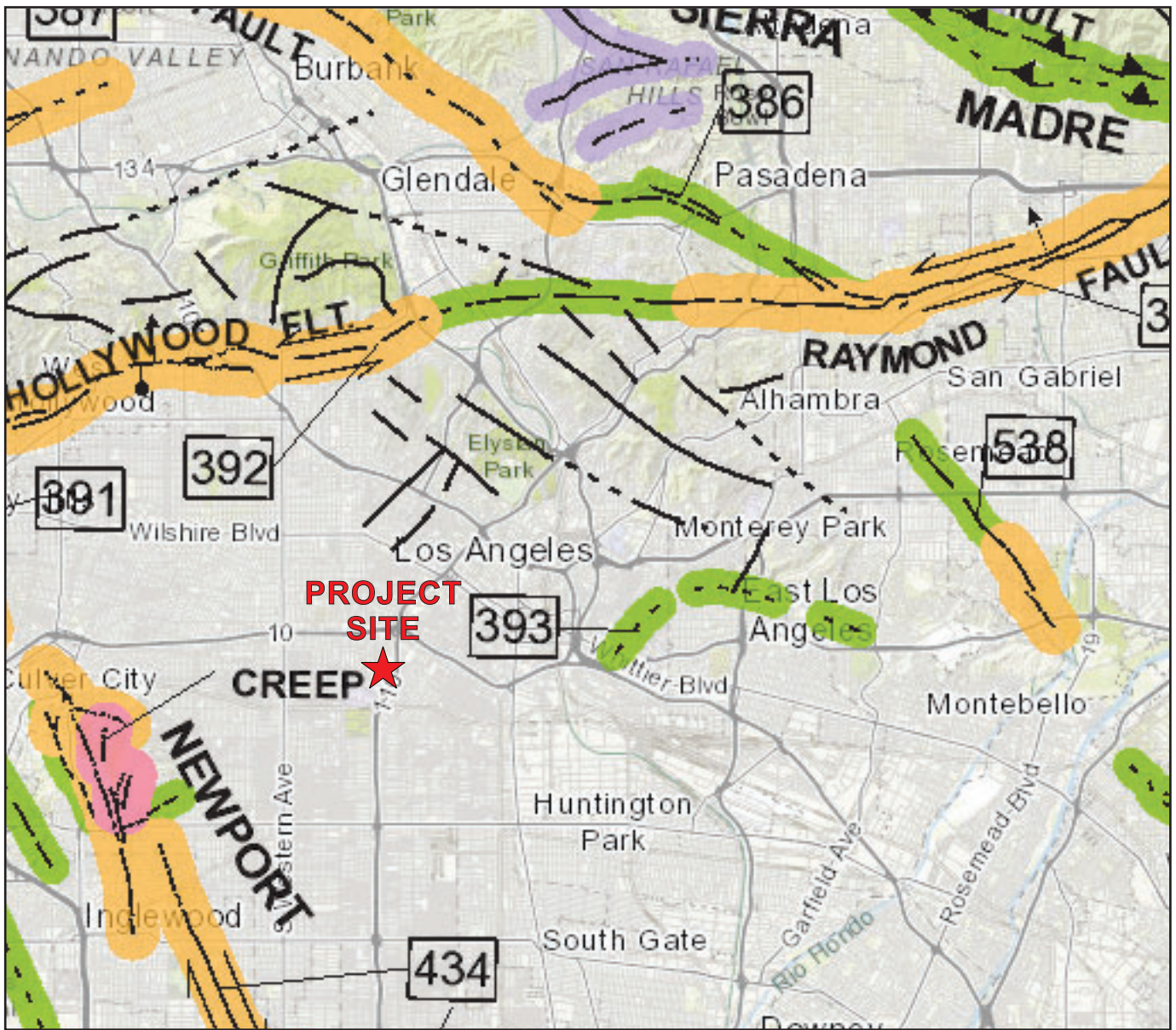
Evidence of ground fissuring has not been identified on the site, and AGS is unaware of ground fissuring the surrounding areas.

4.6.3. Methane

The site is located within a Methane Zone as designated by the City of Los Angeles. The site sits on or just outside the boundary of the Las Cienegas Oil Field. The City of Los Angeles provides specific guidelines for methane testing and methane mitigation. Consultation with a methane testing company and/or mitigation designer should be considered for additional guidance on methane testing and mitigation.

4.6.4. Flooding

A majority of the site is located in Zone X, areas with minimal flood hazards. Portions of 27th Street and a small portion site bordering 27th Street are located within a 0.2% annual chance flood hazard or areas of 1% annual chance flood with depths less than 1 foot zone. Hydrology studies should be provided by the Civil Engineer.



REGIONAL FAULT MAP
PROPOSED AAA PARKING STRUCTURE
640-700 W. 27th STREET,
LOS ANGELES, CALIFORNIA



- Holocene fault displacement (during past 11,700 years) without historic record.
- Late Quaternary fault displacement (during past 700,000 years).
- Quaternary fault (age undifferentiated).
- Pre-Quaternary fault (older than 1.6 million years) or fault without recognized Quaternary displacement.

P/W 2001-03

FIGURE 3

SOURCE MAP - CALIFORNIA DEPARTMENT OF CONSERVATION, CALIFORNIA GEOLOGIC SURVEY, FAULT ACTIVITY MAP OR CALIFORNIA (2010)



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4.7. Seismic Hazards

The site is located in the tectonically active Southern California area, and will therefore likely experience shaking effects from earthquakes. The type and severity of seismic hazards affecting the site are to a large degree dependent upon the distance to the causative fault, the intensity of the seismic event, the direction of propagation of the seismic wave and the underlying soil characteristics. The seismic hazard may be primary, such as surface rupture and/or ground shaking, or secondary, such as liquefaction, seismically induced slope failure or dynamic settlement. The following is a site-specific discussion of ground motion parameters, earthquake-induced landslide hazards, settlement, and liquefaction. The purpose of this analysis is to identify potential seismic hazards and propose mitigations, if necessary, to reduce the hazard to an acceptable level of risk. The following seismic hazards discussion is guided by the California Building Code (2019), CDMG (2008), and Martin and Lew (1998).

4.7.1. Surface Fault Rupture

Surface rupture is a break in the ground surface during or as a consequence of seismic activity. To a large part, research supports the conclusion that active faults tend to rupture at or near pre-existing fault planes. The site is not located in a State of California Alquist-Priolo Fault Zone and faulting has not been mapped at the site. The potential for fault rupture is considered low.

4.7.2. Historical Earthquakes

Earthquakes that have historically impacted the area include the 1857 Fort Tejon Earthquake, the 6.4 magnitude 1933 Long Beach Earthquake, the 1981 Sylmar Earthquake, the 5.9 magnitude 1987 Whittier Narrows Earthquake, and 6.7 magnitude 1994 Northridge Earthquake. Damage during the Northridge Earthquake was locally moderate to severe.

FIGURE 4.7.2, MAP OF HISTORIC EARTHQUAKES (1910-PRESENT)



4.7.3. Seismic Design Parameters

The 2019 California Building Code is based on ASCE Standard 7-16 (American Society of Civil Engineers, 2016) and was adopted in the State of California effective January 1, 2020. Based on our observations during grading, the site is underlain with dense sands with gravel. Based on SPT blow counts, an average N for the upper 51.5 feet has been estimated to be 58 as determined by equation 20.4-2 in the ASCE 7-16. The upper 100-foot of soils are expected to correspond to a Site Class C as described in ASCE 7-16 Chapter 20. Site Class C corresponds to a very dense soil and soft rock profile with an assumed V_{s30} of 537 m/s.

The seismic design parameters presented in Table 4.7.3 were determined in accordance with 2019 CBC and mapped spectral acceleration parameters (United States Geological Survey, 2020) utilizing site coordinates of Latitude 34.0276°N and Longitude 118.2787°W and are applicable to lots classified under seismic Site Class C. A print-out of seismic design parameters are presented in Appendix D.

TABLE 4.7.3 2019 CALIFORNIA BUILDING CODE DESIGN PARAMETERS	
Seismic Site Class	C
Mapped Spectral Acceleration Parameter at Period of 0.2-Second, S_s	1.906g
Mapped Spectral Acceleration Parameter at Period 1-Second, S_1	0.676g
Site Coefficient, F_a	1.200
Site Coefficient, F_v	1.400
Adjusted MCE_R^1 Spectral Response Acceleration Parameter at Short Period, S_{MS}	2.287g
1-Second Period Adjusted MCE_R^1 Spectral Response Acceleration Parameter, S_{M1}	0.946g
Short Period Design Spectral Response Acceleration Parameter, S_{DS}	1.525g
1-Second Period Design Spectral Response Acceleration Parameter, S_{D1}	0.631g
Peak Ground Acceleration, PGA_M^2	0.976g
Seismic Design Category	D
Notes: ¹ Risk-Targeted Maximum Considered Earthquake ² Peak Ground Acceleration adjusted for site effects	

4.7.4. Liquefaction

Liquefaction is the phenomenon in which the buildup of excess pore pressures, in saturated granular soils due to seismic agitation, results in a temporary “quick” or “liquefied” condition. Loose lenses/layers of sandy soils may be subject to liquefaction when a large, prolonged, seismic event affects the site. Once the excess pore water pressure dissipates, the liquefied zones/lenses will likely consolidate causing settlement. Post liquefaction effects at a site can manifest in several ways, and may include: ground deformations, loss of bearing strength, lateral spreading, flow failure, and dynamic settlement.

The site is not located within a mapped zone of required investigation for liquefaction on the State of California Seismic Hazard Zone Map nor within an area mapped by the City of Los Angeles as being susceptible to liquefaction.

Dense silty to gravelly sands were encountered within the borings. Based on the high SPT blow counts observed, the underlying soils are considered resistant to liquefaction or seismic settlement.

4.7.5. Seismically Induced Landsliding

The site is nearly level and significant nearby slopes are not present. As such, the possibility for seismically induced landsliding to impact the development is considered very low to nil.

4.7.6. Earthquake Induced Flooding

Earthquake induced flooding can be caused by tsunamis, dam failures, or seiches. Also, earthquakes can cause landslides that dam rivers and streams, and flooding can occur upstream above the dam and also downstream when these dams are breached. A seiche is

a free or standing-wave oscillation on the surface of water in an enclosed or semi-enclosed basin. The wave can be initiated by an earthquake and can vary in height from several centimeters to a few meters. Owing to the site's significant distance from both the ocean and an enclosed body of water, the risk of seismically induced flooding due to a tsunami or seiche is also considered low to nil.

5.0 GEOTECHNICAL ENGINEERING

Presented herein is a general discussion of the geotechnical properties of the various soil types and the analytic methods used in this report.

5.1. Material Properties

5.1.1. Excavation Characteristics

Based on our previous experience with similar projects at the subject site, it is our opinion that the majority of the earth material onsite can be readily excavated with conventional grading equipment.

5.1.2. Compressibility

The existing fill materials are considered compressible and prone to settlement. These soils are unsuitable for the support of structural improvements and area expected to be removed and replaced with compacted fill.

5.1.3. Expansion Potential

The expansion potential of a representative sample tested was "very low" when classified in accordance with ASTM D 4829.

5.1.4. Chemical and Resistivity Test Results

The test results from a sample collected during the current investigation indicated a sulfate concentration that corresponds to a S0 sulfate exposure class when classified in accordance with ACI 318.

The onsite soils are expected to be slightly corrosive to ferrous metals.

5.1.5. Pavement Support Characteristics

Compacted fill derived from onsite soils is expected to possess good pavement support characteristics.

5.1.6. Shear Strength

Shear strength testing was conducted. The shear strengths that were used by AGS for design are presented in the following table.

Material	Cohesion (psf)	Friction Angle (degrees)	Moist Density (pcf)
Compacted Fill (95% RC)	0	38	135

5.2. Bearing Capacity and Lateral Earth Pressures

Ultimate bearing capacity and shoring design values were obtained using the graphs and formulas presented in *NAVFAC DM-7.1*. Allowable bearing was determined by applying a factor of safety of at least three to the ultimate bearing capacity. Settlement below footings was estimated using Burland and Burbidge's Method, an empirical method utilizing SPT results for cohesionless soils.

Static lateral earth pressures were calculated using *Rankine* methods for active and passive cases. If it is desired to use *Coulomb* forces, a separate analysis specific to the application can be conducted.

6.0 GRADING AND SHORING RECOMMENDATIONS

Based on the information provided herein, the proposed project is considered feasible from a geotechnical standpoint provided the conclusions and recommendations presented herein are incorporated into the design and construction of the project.

6.1. Earthwork Recommendations and Considerations

All grading should be accomplished under the observation and testing of the project soils engineer and engineering geologist or their authorized representative in accordance with the recommendations contained in the approved geotechnical reports, the Grading Specifications contained in Appendix E, the project specifications, and the Building Code. Prior to fill placement, the bottoms of all removal areas should be observed and approved by the engineering geologist/soils engineer or their authorized representative.

Onsite materials are suitable for use as compacted fill provided any deleterious materials, including organic materials, are removed. Abandoned utilities should be removed and/or abandoned in accordance with local regulations. Mixing and moisture control of materials will be necessary. All fills below the building and pavement areas should be compacted at least 95 percent of the maximum dry density as determined by ASTM D1557. Fill should be placed in thin (6 to 8-inch) lifts, moisture conditioned to optimum moisture or slightly above, and compacted to 95 percent of the maximum dry density (ASTM D1557) until the desired grade is achieved.

Import soils, if required, should consist of clean, structural quality, compactable materials similar to the on-site soils and should be free of trash, debris or other objectionable materials. Import soils should be tested and approved by the Geotechnical Consultant prior to importing.

6.1.1. Site Preparation

Existing vegetation, trash, debris, and other deleterious materials should be removed and wasted from the site prior to commencing removal of unsuitable soils and placement of compacted fill materials. Additionally, all pre-existing foundations elements and utility conduits should be removed and wasted off-site. Abandoned utilities should be removed and/or abandoned in accordance with local regulations.

6.1.2. Removals/Overexcavation

Materials that have been disturbed during the demolition activities should be removed in their entirety prior to placement of compacted engineered fill. Undocumented artificial fill materials and loose alluvial soils should also be removed to expose dense alluvial deposits. It is anticipated that removals will vary from 4 to 6 feet but could locally be deeper.

Overexcavation should be accomplished to provide a minimum of 5 feet of fill below the structure or 3 feet below the bottom of foundation elements, whichever is deeper. Pavement areas outside the structure should be overexcavated to provide a minimum fill thickness of two feet.

6.1.3. Utility Trench Excavation and Backfill

All utility trenches should be shored or laid back in accordance with applicable OSHA standards. Excavations in bedrock areas should be made in consideration of underlying geologic structure. The geotechnical consultant should be consulted on these issues during construction.

Utility trench backfill should be compacted to at least 95 percent of maximum dry density as determined by ASTM D 1557. Onsite soils will not be suitable for use as bedding material but will be suitable for use in backfill, provided oversized materials are removed. No surcharge loads should be imposed above excavations. This includes spoil piles, lumber, concrete trucks or other construction materials and equipment. Drainage above excavations should be directed away from the banks. Care should be taken to avoid saturation of the soils.

Compaction should be accomplished by mechanical means. Jetting of native soils will not be acceptable.

6.1.4. Flatwork Subgrade Preparation

The upper one foot of subgrade below exterior slabs, sidewalks, driveways, patios, etc. should be compacted to a minimum of 95 percent of the maximum dry density as determined by ASTM D1557. The subgrade below exterior slabs, sidewalks, driveways, patios, etc. should be moisture conditioned to a minimum of optimum moisture content prior to concrete placement.

6.2. Excavations and Temporary Backcuts

All excavations should be shored or laid back in accordance with applicable Cal-OSHA standards. Based on the boring logs, a majority of the upper soils are considered Cal-OSHA soil type “C”.

Any temporary excavation greater than 5 feet in height should be laid back with a 1.5:1 (horizontal: vertical) gradient. These excavations should not become saturated or allowed to dry out. Surcharge loads should not be permitted within a distance equal to the height of the excavation from the top of the excavation.

7.0 CONCLUSIONS AND DESIGN RECOMMENDATIONS

Construction of the proposed parking structure is considered feasible, from a geotechnical standpoint, provided that the conclusions and recommendations presented herein are incorporated into the design and construction of the project. As with all projects, changes in observed conditions may result in alternative construction techniques and/or possible delays. The contractor should be aware of these possibilities and provide contingencies in his bids to account for them.

7.1. Foundation Design Recommendations

The support of the parking garage on shallow conventionally reinforced spread footings or a mat foundation is considered feasible. Foundations may be designed using the values provided in the following sections. These values may be increased as allowed by Code to resist transient loads such as wind or seismic. Building code and structural design considerations may govern depth and reinforcement requirements and should be evaluated.

TABLE 7.1 FOUNDATION DESIGN PARAMETERS	
Allowable Bearing	4,000 psf for a minimum 18-inch width and depth
Lateral Bearing	350 psf /ft embedment to a maximum of 4,000 psf.
Sliding Coefficient*	0.40
Modulus of Subgrade Reaction k_1 (1x1ft) **	225 psi/ in
Notes	
*For resisting lateral forces on footings, lateral bearing and sliding coefficient may be combined with a maximum sliding resistance limited to ½ of dead load.	
** For calculating the modulus of subgrade reaction for a foundation (k_f), the following equation should be used: $k_f = k_1 * [(B + 1) / (2*B)]^2$, where B is side dimension of foundation.	

7.1.1. Footing Excavations

Footing excavations should be observed by the geotechnical consultant. Footings should be excavated into competent compacted fill soils. Additional recommendations will be necessary should unsuitable soils be encountered at the excavation bottom. The

excavations should be free of all loose and sloughed materials, be neatly trimmed, and moisture conditioned at the time of concrete placement.

7.1.2. Settlement

Settlements are likely to be produced from structural loads. AGS has provided a preliminary estimate of settlement below a continuous spread footing. A width of 8 feet was assumed with an allowable bearing capacity of 4,000 psf. The total settlement was estimated using Burland and Burbidge's Method, an empirical method utilizing SPT results for cohesionless soils, and found to be around 1 inch. For preliminary design purposes, AGS recommends that the structure be designed for a total settlement of around 1.5 inches and a differential settlement around one half of the total settlement across 40 feet.

AGS should re-evaluate the settlement based on actual structural loads and footing sizes.

7.2. Moisture and Vapor Barrier

A moisture and vapor retarding system should be placed below the slabs-on-grade in portions of the structure considered to be moisture sensitive. The retarder should be of suitable composition, thickness, strength and low permeance to effectively prevent the migration of water and reduce the transmission of water vapor to acceptable levels. Historically, a 10-mil plastic membrane, such as *Visqueen*, placed between one to four inches of clean sand, has been used for this purpose. More recently Stego[®] Wrap or similar underlayments have been used to lower permeance to effectively prevent the migration of water and reduce the transmission of water vapor to acceptable levels. The use of this system or other systems, materials or techniques can be considered, at the discretion of the designer, provided the system reduces the vapor transmission rates to acceptable levels.

7.3. Retaining Wall Design

The foundations for retaining walls should be founded on compacted fill and may be designed in accordance with the recommendations provided in Table 7.1, Foundation Design Parameters. When calculating the lateral resistance, the upper 12 inches of soil cover should be ignored in areas that are not covered with hardscape. Retaining wall footings should be designed to resist the lateral forces by passive soil resistance and/or base friction as recommended for foundation lateral resistance.

Retaining walls should be designed to resist earth pressures presented in the following table. These values assume that the retaining walls will be backfilled with non-expansive free draining materials (Sand Equivalent of 20 or better and an Expansion Index of 20 or less). Some of the materials onsite are considered free-draining and will be suitable for placement behind these walls. If non-free draining materials are utilized, revised values will need to be provided to design the retaining walls. Retaining walls should be designed to resist additional loads such as construction loads, temporary loads, and other surcharges as evaluated by the structural engineer.

TABLE 7.3		
RETAINING WALL EARTH PRESSURES		
“Native” Backfill Materials ($\gamma=135\text{pcf}$, $EI\leq 20$, $\phi'=38^\circ$)		
	Rankine Coefficients	Equivalent Fluid Pressure (psf / lineal foot)
Active Pressure	$K_a = 0.24$	32
Passive Pressure	$K_p = 4.20$	560
At Rest Pressure	$K_o = 0.38$	52

In addition to the above static pressures, unrestrained retaining walls located should be designed to resist seismic loading as required by the 2019 CBC. The seismic load can be modeled as a thrust load applied at a point 0.6H above the base of the wall, where H is equal to the height of the wall. This seismic load (in pounds per lineal foot of wall) is represented by the following equation:

$$P_e = \frac{3}{8} * \gamma * H^2 * k_h$$

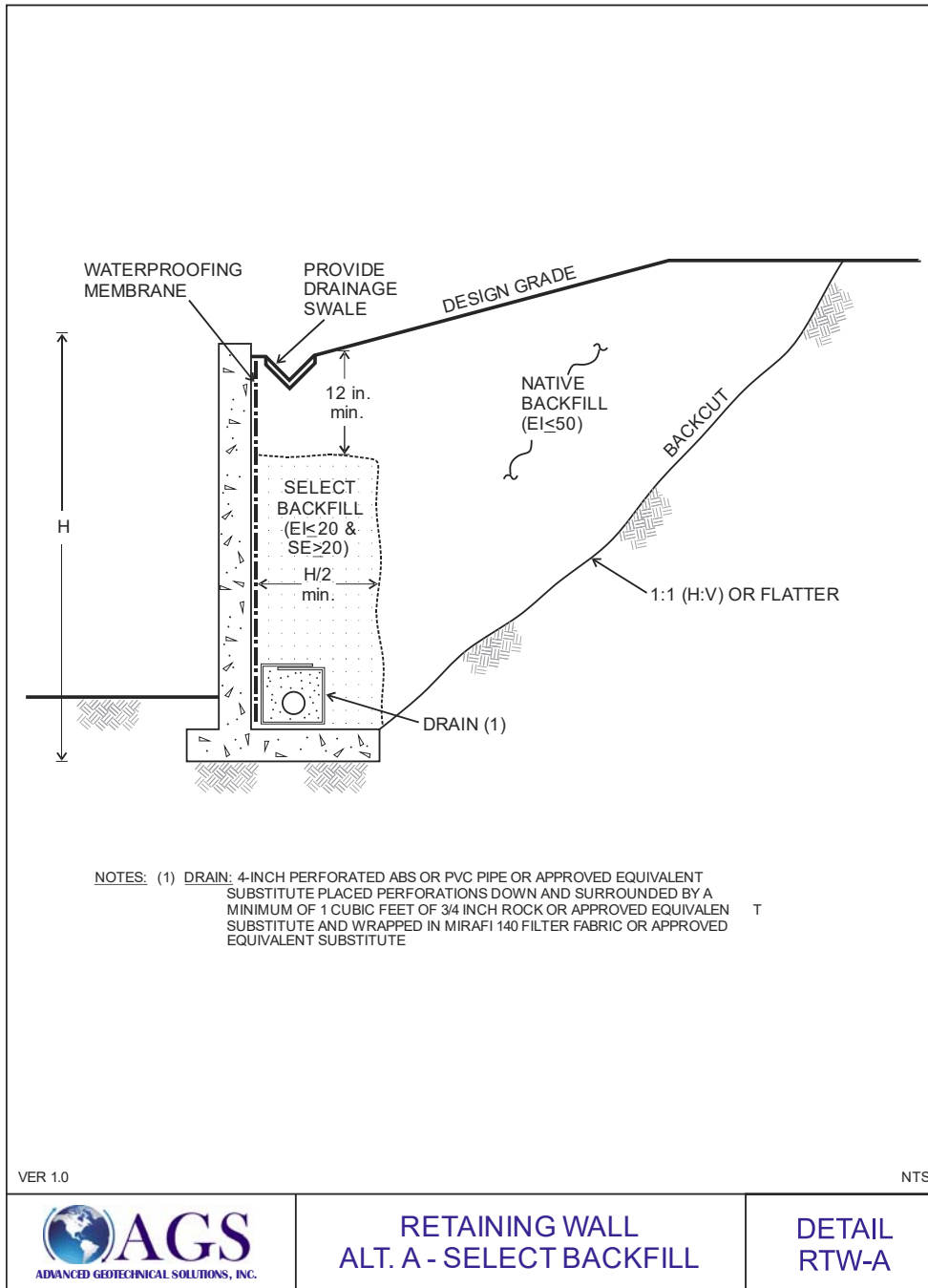
- Where: P_e = Seismic thrust load
 H = Height of the wall (feet)
 γ = soil density = 135 pounds per cubic foot (pcf)
 k_h = seismic pseudostatic coefficient = $0.5 * \text{peak horizontal ground acceleration} / g$

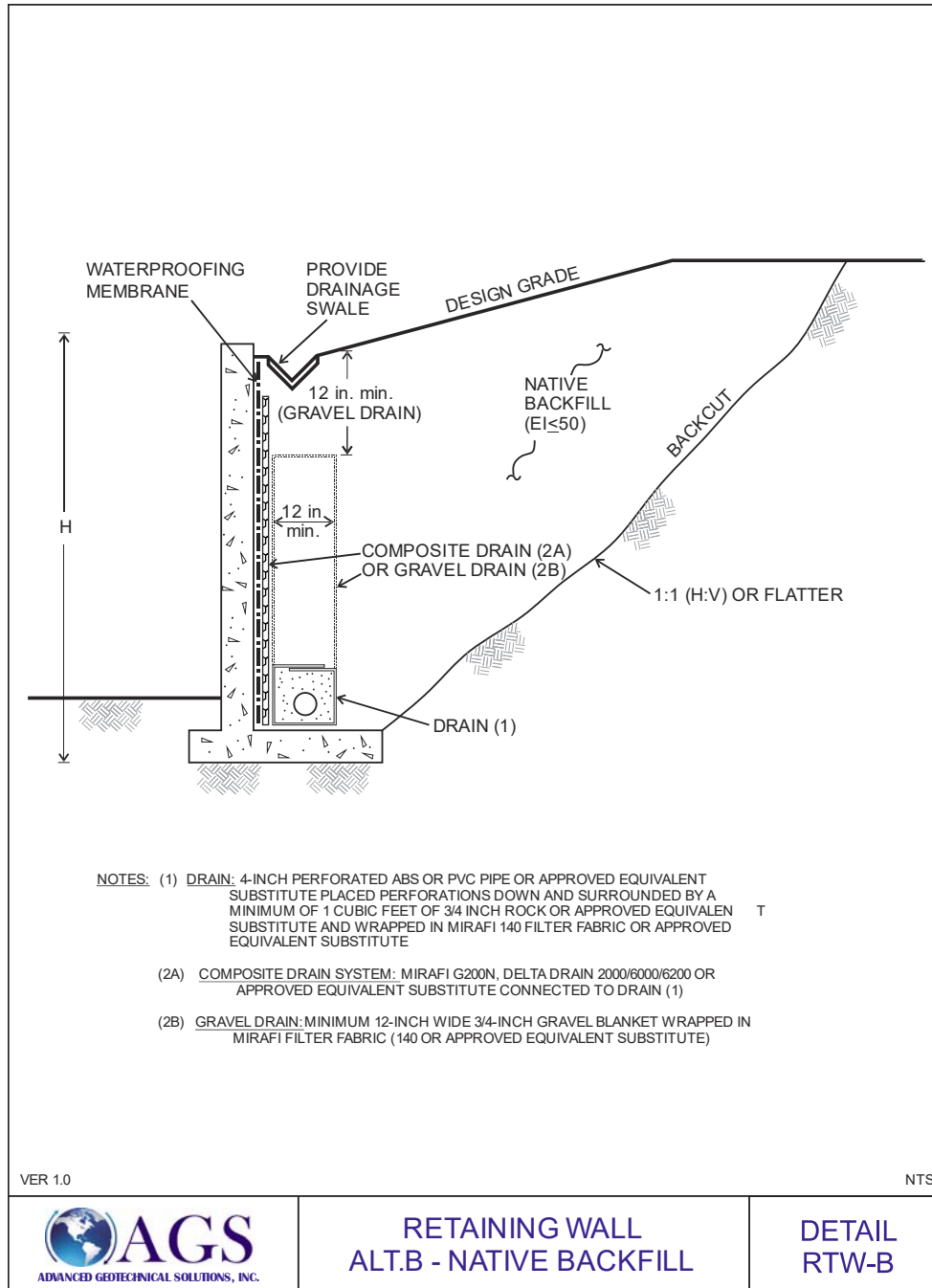
Walls should be designed to resist the combined effects of static pressures and the above seismic thrust load.

Retaining walls should be provided with a drainage system adequate to prevent the buildup of hydrostatic forces as shown in Details RTW-A and RTW-B. Otherwise, the retaining walls should be designed to resist hydrostatic forces. Basement walls located below groundwater should be designed to resist hydrostatic forces. Proper drainage devices should be installed along the top of the wall backfill and should be properly sloped to prevent surface water ponding adjacent to the wall. In addition to the wall drainage system, for building perimeter walls extending below the finished grade, the wall should be waterproofed and/or damp-proofed to effectively seal the wall from moisture infiltration through the wall section to the interior wall face.

The wall should be backfilled with granular soils placed in loose lifts no greater than 8 inches thick, at or near optimum moisture content, and mechanically compacted to a minimum 95 percent of the maximum dry density as determined by ASTM D1557. Flooding or jetting of backfill materials generally do not result in the required degree and uniformity of compaction and, therefore, is not recommended. No backfill should be placed against concrete until minimum design strengths are achieved as verified by compression tests of cylinders. The geotechnical consultant should observe the retaining wall footings, back drain installation, and be

present during placement of the wall backfill to confirm that the walls are properly backfilled and compacted.





7.4. Concrete Design

Testing by AGS indicated that the onsite soils have low concentrations of soluble sulfate, corresponding to an S0 exposure class when classified in accordance with ACI 318. Sulfate resistant concrete is not required per code.

7.5. Corrosion

The onsite soils are expected to be slightly to moderately corrosive to buried metallic materials. AGS recommends minimally that the current standard of care be employed for protection of metallic construction materials in contact with onsite soils or that consultation with an engineer specializing in corrosion to determine specifications for protection of the construction materials. Steel reinforcement in contact with onsite soils should be protected with an epoxy coating, adequate concrete cover, or other approved methods as detailed by the structural engineer.

7.6. Site Drainage

Final site grading should assure positive drainage away from structures. Planter areas should be provided with area drains to transmit irrigation and rain water away from structures. The use of gutters and down spouts to carry roof drainage well away from structures is recommended. Raised planters should be provided with a positive means to remove water through the face of the containment wall.

7.7. Exterior Flatwork

Concrete flatwork not subject to vehicular traffic loading should be designed utilizing 4-inch minimum thickness. Consideration should be given to construct a thickened edge (scoop footing) at the perimeter of slabs and walkways adjacent to landscape areas to minimize moisture variation below these improvements. The thickened edge (scoop footing) should extend approximately 8 inches below concrete slabs and should be a minimum of 6 inches wide.

Weakened plane joints should be installed on walkways at intervals of approximately 6 to 8 feet. Exterior slabs should be designed to withstand shrinkage of the concrete. Consideration should be given to reinforcing any exterior flatwork.

7.8. Pavement Design

Preliminary pavement recommendations for parking areas, driveways, and ramps are provided below. The performance of pavement is highly dependent on providing positive surface drainage away from the edge of pavement. Ponding of water on or adjacent to the pavement will likely result in pavement distress and subgrade failure. Drainage from landscaped areas should be directed towards controlled drainage structures and not towards pavement areas.

7.8.1. Asphalt Concrete Pavement

Presented below are preliminary pavement sections for a range of traffic indices using a Resistance-Value of 40 for the subgrade soils. R-Value testing of the subgrade soils should be performed during precise grading operations to verify the R-Value of 40. The project Civil Engineer should select traffic indices that are appropriate for the anticipated pavement usage and level of maintenance desired through the pavement life.

TABLE 7.8.1			
PRELIMINARY ASPHALT CONCRETE PAVEMENT SECTIONS			
Traffic Index	Assumed R-Value	Asphalt Concrete (inches)	Class 2 Aggregate Base (inches)
4.5 (Private Driveway)	40	3	4**
4.5 (Residential Alleyway)	40	4*	4**
4.5 (Residential Alleyway)- Alternate Section	40	5	0
6.0 (Commercial Alleyway)	40	6*	0
*Minimum City of Los Angeles asphalt concrete pavement thickness (per Bureau of Engineering Manual) **Minimum City of Los Angeles aggregate base thickness when used (per Bureau of Engineering Manual)			

Pavement subgrade soils should be at or near optimum moisture content and should be compacted to a minimum of 95 percent of the maximum dry density as determined by ASTM D1557. Aggregate base should be compacted to a minimum of 95 percent of the maximum dry density as determined by ASTM D1557 and should conform with the specifications listed in Section 26 of the *Standard Specifications for the State of California Department of Transportation* (Caltrans) or Section 200-2 of the *Standard Specifications for Public Works Construction* (Green Book). The asphalt concrete should conform to Section 26 of the Caltrans *Standard Specifications* or Section 203-6 of the Green Book.

7.8.2. Portland Cement Concrete Pavement

Portland cement concrete may be used for the onsite driveways, trash enclosures, and truck loading docks. The following concrete pavement sections were determined using the recommendations provided in “Design of Concrete Pavement for City Streets” by the American Concrete Pavement Association. Testing of subgrade soils should be performed once driveway subgrades are achieved to determine the actual R-Value of the subgrade soils and/or corresponding modulus of subgrade reaction.

TABLE 7.8.2				
PORTLAND CEMENT CONCRETE PAVEMENT				
Traffic Classification	Maximum ADDT*	Portland Cement Concrete Section (inches)**	k* (pci)	MR* (psi)
Residential	50	5.5	225	550
Residential	50	5.0	225	600
Residential	50	5.0	225	650
<p>*Notes: k = Modulus of subgrade reaction; ADDT = Average daily truck traffic; MR=Flexural strength of concrete (Modulus of Rupture) 550 corresponds to concrete having a minimum compressive strength of roughly 3,000 psi.; 600 corresponds to concrete having a minimum compressive strength of roughly 3,600 psi.; 650 corresponds to concrete having a minimum compressive strength of roughly 4,200 psi.</p> <p>** Minimum City of Los Angeles concrete pavement thickness in roadways is 6 inches (per Bureau of Engineering Manual); Minimum City of Los Angeles driveway thickness is 4inches in R-1 or R-2 zone and 6 inches elsewhere.</p>				

Joints should be provided at a minimum spacing of 8 feet. The joints should be caulked and sealed with a flexible compound to reduce the potential for moisture infiltration. The civil engineer should determine the need for reinforcement and doweling.

The subgrade should be moisture conditioned and compacted to a minimum of 95 percent of the maximum dry density as determined by ASTM D1557. Subgrade soils should be at or near the optimum moisture content to a depth of 12-inches immediately prior to placing concrete.

8.0 FUTURE STUDY NEEDS

8.1. Future Geotechnical Studies

Design plans have not yet been developed. The recommendations provided herein are considered preliminary and subject to change based on the actual design. When available, the Geotechnical Consultant of Record should review detailed construction plans. The following plans should be reviewed:

- Foundation Plans;
- Grading Plans;

8.2. Observation during Construction

Geologic exposures afforded during remedial and rough grading operations provide the best opportunity to evaluate the anticipated site geologic structure. Continuous geologic and geotechnical observations, testing, and mapping should be provided throughout site development. Additional near-surface samples should be collected by the geotechnical consultant during grading and subjected to laboratory testing. Final design recommendations should be provided in a grading report based on the observation and test results collected during grading.

8.2.1. Observation during Placement of Compacted Fill Materials

The geotechnical consultant should provide continuous observation and testing during the placement of compacted fill materials as required by CBC Section 1704.7.

8.2.2. As-Built Geotechnical Report

The geotechnical as-built report should be prepared at the conclusion of the project. The report should present observation and test results collected during placement of compacted fill materials.

9.0

CLOSURE

The findings and recommendations in this report are based on the specific excavations, observations, and tests results obtained during this investigation. The findings are based on the review of the field and laboratory data combined with an interpolation and extrapolation of conditions between and beyond the exploratory excavations. The results reflect an interpretation of the direct evidence obtained. Services performed by AGS have been conducted in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions. No other representation, either expressed or implied, and no warranty or guarantee is included or intended.

The recommendations presented in this report are based on the assumption that an appropriate level of field review will be provided by geotechnical engineers and engineering geologists who are familiar with the design and site geologic conditions. That field review shall be sufficient to confirm that geotechnical and geologic conditions exposed during grading are consistent with the geologic representations and corresponding recommendations presented in this report. If the project description varies from what is described in this report, AGS must be consulted regarding the applicability of, and the necessity for, any revisions to the recommendations presented herein. AGS should review structural plans to verify whether the recommendations presented herein are incorporated into the design. AGS accepts no liability for any use of its recommendations if the project description or final design varies and AGS is not consulted regarding the changes.

The data, opinions, and recommendations of this report are applicable to the specific design of this project as discussed in this report. They have no applicability to any other project or to any other location, and any and all subsequent users accept any and all liability resulting from any use or reuse of the data, opinions, and recommendations without the prior written consent of AGS.

AGS has no responsibility for construction means, methods, techniques, sequences, or procedures, or for safety precautions or programs in connection with the construction, for the acts or omissions of the CONTRACTOR, or any other person performing any of the construction, or for failure of any of them to carry out the construction in accordance with the final design drawings and specifications.

APPENDIX A

REFERENCES

APPENDIX A

REFERENCES

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APPENDIX B
LOG OF EXPLORATORY BORINGS

APPENDIX B

SUBSURFACE EXPLORATION

Four borings were advanced onsite using a truck mounted hollow stem auger drill rig (CME-75) equipped with an eight inch auger. The approximate locations of the exploratory borings are shown on Plate 1, and the Geotechnical Boring Logs are attached.

Representative bulk soil samples were obtained from the borings at selected depths. Bulk samples were collected for representative soil types. Relatively undisturbed samples were obtained by driving a Modified California Sampler into the material a total of 18-inches. The Modified California Sampler is a spoon-type sampler, which has an inside diameter of 2.42-inches and a tapered cutting tip at the lower end. The barrel is lined with thin brass rings, each 1-inch in length. Material is retained within the brass rings during the driving of the sampler. In addition, samples were collected using a Standard Penetrometer Test sampler.

The ring samples and bulk samples were transported to CTE's laboratory for testing. Laboratory testing procedures and test results are presented in Appendix C of this report.



CLIENT Automobile Club of Southern California
 PROJECT NUMBER 2001-03
 DATE STARTED 2/1/20 COMPLETED 2/1/20
 DRILLING CONTRACTOR Baja Exploration
 DRILLING METHOD Hollow Stem Auger
 LOGGED BY SS CHECKED BY SD
 NOTES _____

PROJECT NAME AAA Parking Structure
 PROJECT LOCATION 640-700 W. 27th Street, Los Angeles, California
 GROUND ELEVATION 200 ft HOLE SIZE 8
 GROUND WATER LEVELS:
 AT TIME OF DRILLING ---
 AT END OF DRILLING ---
 AFTER DRILLING ---

DEPTH (ft)	GRAPHIC LOG	USCS	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	BLOW COUNTS (N VALUE)	DRY UNIT WT. (pcf)	MOISTURE CONTENT (%)	SATURATION (%)	OTHER TESTS	ATTERBERG LIMITS			FINES CONTENT (%)
										LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	
0			6" AC										
0 - 2.5		SM	Artificial Fill - Undocumented. (afu) Silty fine-grained SAND with sub-angular Gravel, dark yellow brown to gray brown, slightly moist, loose	BU					EI, Max. Remold, Chem. SA				35
2.5 - 5		SP-SM	Alluvium. (Qa) Poorly graded SAND with Silt and with sub-angular Gravel, yellow brown, slightly moist, dense	MC	12-20-17 (37)								
5 - 12		SM	Older Alluvium. (Qoa) Silty fine- to coarse-grained SAND with sub-angular Gravel, yellow brown to gray brown, slightly moist, dense; minor iron oxide staining	MC	16-25-29 (54)								
12 - 15		SW	@12.0 ft., Well graded SAND with sub-angular Gravel, lighter yellow brown to gray brown										
15 - 20			@15.0 ft., very dense	MC	38-50	117	4.9	30					5
20 - 25		SW-SM	@20.0 ft., Well graded SAND with Silt and sub-angular Gravel, dry to slightly moist, very dense; micaceous, iron oxide staining	SPT	18-50/5"				SA				10
25 - 30			@25.0 ft., Poorly graded SAND with sub-angular gravel, yellow brown, dry to slightly moist, very dense; micaceous	SPT	11-50/5"								
30 - 35			@30.0 ft., Rock fragments in tip, no recovery	SPT	4-44-50/2"								

(Continued Next Page)

AGS BORING LOG V2 - GINT STD US LAB.GDT - 3/10/20 16:07 - Z:\PROJECT FILES\2001-03 AAA PARKING GARAGE 640 W 27TH STREET LOS ANGELES\LOGS AND LAB\2001-03 LOGS.GPJ



CLIENT Automobile Club of Southern California

PROJECT NAME AAA Parking Structure

PROJECT NUMBER 2001-03

PROJECT LOCATION 640-700 W. 27th Street, Los Angeles, California

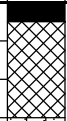
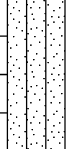
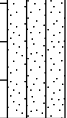

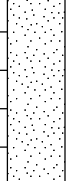
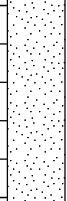
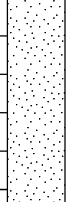
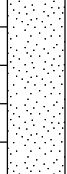
AGS BORING LOG V2 - GINT STD US LAB.GDT - 3/10/20 16.07 - Z:\PROJECT FILES\2001-03 AAA PARKING GARAGE 640 W 27TH STREET LOS ANGELES\LOGS AND LAB\2001-03 LOGS.GPJ

DEPTH (ft)	GRAPHIC LOG	USCS	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	BLOW COUNTS (N VALUE)	DRY UNIT WT. (pcf)	MOISTURE CONTENT (%)	SATURATION (%)	OTHER TESTS	ATTEBERG LIMITS			FINES CONTENT (%)
										LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	
35		SP	@35.0 ft., Poorly graded SAND with Silt and sub-angular Gravel	SPT	18-29-31 (60)								
40		SM	@40.0 ft., Silty fine- to coarse-grained SAND with sub-angular Gravel	SPT	21-25-37 (62)								
45		SP	@45.0 ft., Poorly graded SAND	SPT	20-30-37 (67)								
50				SPT	31-32-44 (76)								

TD = 51.5 feet
 No groundwater encountered
 Backfilled with neat cement tremie up from the bottom

CLIENT Automobile Club of Southern California
PROJECT NUMBER 2001-03
DATE STARTED 2/1/20 **COMPLETED** 2/1/20
DRILLING CONTRACTOR Baja Exploration
DRILLING METHOD Hollow Stem Auger
LOGGED BY SS **CHECKED BY** SD
NOTES _____

PROJECT NAME AAA Parking Structure
PROJECT LOCATION 640-700 W. 27th Street, Los Angeles, California
GROUND ELEVATION 200 ft **HOLE SIZE** 8
GROUND WATER LEVELS:
AT TIME OF DRILLING ---
AT END OF DRILLING ---
AFTER DRILLING ---

DEPTH (ft)	GRAPHIC LOG	USCS	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	BLOW COUNTS (N VALUE)	DRY UNIT WT. (pcf)	MOISTURE CONTENT (%)	SATURATION (%)	OTHER TESTS	ATTERBERG LIMITS			FINES CONTENT (%)
										LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	
0			6" AC										
		SM	Artificial Fill - Undocumented. (afu) Silty fine-grained SAND with sub-angular Gravel, dark yellow brown to gray brown, slightly moist to moist, loose to medium dense										
		SM	Alluvium. (Qa) Silty fine-to medium-grained SAND with sub-angular Gravel, yellow brown, slightly moist, medium dense	MC	11-12-15 (27)	114	3.4	19					
			@7.0 ft., Silty fine- to coarse-grained SAND with sub-angular Gravel, light yellow brown, dry to slightly moist, very dense; micaceous	MC	21-50/5"	123	1.7	13					
		SW-SM	@ 10.0 ft., Well graded SAND with Silt and sub-angular Gravel	SPT	12-23-16 (39)								16
		SP	Older Alluvium. (Qoa) Poorly graded SAND with Silt and sub-angular gravel, yellow brown to orange brown, dry to slightly moist, very dense; micaceous; minor iron oxide staining	SPT	10-36-50 (86)				SA				11
				SPT	24-50/2"								
			@25.0 ft., Poorly graded SAND with sub-angular Gravel, yellow brown to orange brown, dry to slightly moist, very dense; micaceous	SPT	10-45-50/2"								
				SPT	19-19-33 (52)								

AGS BORING LOG V2 - GINT STD US LAB.GDT - 3/10/20 16:07 - Z:\PROJECT FILES\2001-03 AAA PARKING GARAGE 640 W 27TH STREET LOS ANGELES\LOGS AND LAB\2001-03 LOGS.GPJ



CLIENT Automobile Club of Southern California

PROJECT NAME AAA Parking Structure

PROJECT NUMBER 2001-03

PROJECT LOCATION 640-700 W. 27th Street, Los Angeles, California

AGS BORING LOG V2 - GINT STD US LAB.GDT - 3/10/20 16.07 - Z:\PROJECT FILES\2001-03 AAA PARKING GARAGE 640 W 27TH STREET LOS ANGELES\LOGS AND LAB\2001-03 LOGS.GPJ

DEPTH (ft)	GRAPHIC LOG	USCS	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	BLOW COUNTS (N VALUE)	DRY UNIT WT. (pcf)	MOISTURE CONTENT (%)	SATURATION (%)	OTHER TESTS	ATTEBERG LIMITS			FINES CONTENT (%)
										LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	
35		SM	@35.0 ft., Sandy SILT to Silty SAND with sub-angular Gravel, fine-grained, dark orange brown to dark red brown, moist; very dense to hard	SPT	4-8-25 (33)								
40		SW	@40.0 ft., Well graded SAND with sub-angular Gravel, yellow brown to orange brown, dry to slightly moist, very dense; iron oxide staining	SPT	15-25-32 (57)								

TD = 43 feet
 No groundwater encountered
 Backfilled with neat cement tremie up from the bottom



CLIENT Automobile Club of Southern California
PROJECT NUMBER 2001-03
DATE STARTED 2/8/20 **COMPLETED** 2/8/20
DRILLING CONTRACTOR Baja Exploration
DRILLING METHOD Hollow Stem Auger
LOGGED BY SS **CHECKED BY** SD
NOTES _____

PROJECT NAME AAA Parking Structure
PROJECT LOCATION 640-700 W. 27th Street, Los Angeles, California
GROUND ELEVATION 199 ft **HOLE SIZE** 8
GROUND WATER LEVELS:
AT TIME OF DRILLING ---
AT END OF DRILLING ---
AFTER DRILLING ---

AGS BORING LOG V2 - GINT STD US LAB.GDT - 3/10/20 16:07 - Z:\PROJECT FILES\2001-03 AAA PARKING GARAGE 640 W 27TH STREET LOS ANGELES\LOGS AND LAB\2001-03 LOGS.GPJ

DEPTH (ft)	GRAPHIC LOG	USCS	MATERIAL DESCRIPTION	SAMPLE TYPE NUMBER	BLOW COUNTS (N VALUE)	DRY UNIT WT. (pcf)	MOISTURE CONTENT (%)	SATURATION (%)	OTHER TESTS	ATTEBERG LIMITS			FINES CONTENT (%)
										LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	
0			6" AC										
		SM	Artificial Fill - Undocumented. (afu) Silty fine-grained SAND, dark brown, dry to slightly moist, loose										
5		SW-SM	Alluvium. (Qa) Well graded SAND with Silty and sub-angular Gravel, yellow brown, slightly moist, dense; micaceous @5.0 ft., very dense	▲ SPT	12-22-22 (44)				SA				11
10		SW	Older Alluvium. (Qoa) Well graded SAND with Silt and sub-angular Gravel, yellow brown, slightly moist, dense; micaceous, minor iron oxide staining	▲ SPT	9-33-50/5"								
15			@15.0 ft., darker yellow brown, increased moisture	▲ SPT	41-20-50/3"								
20			@20.0 ft., yellow brown to orange brown	▲ SPT	33-50/3"								

TD = 20.75 feet
 No groundwater encountered
 Backfilled with neat cement tremie up from the bottom

APPENDIX C
LABORATORY TEST RESULTS



Construction Testing & Engineering, Inc.

Inspection | Testing | Geotechnical | Environmental & Construction Engineering | Civil Engineering | Surveying

March 10, 2020

CTE Job No. 10-13575L

Advanced Geotechnical Solutions
Attention: Mr. Sean Donovan
485 Corporate Drive, Suite B
Escondido, California 92029
Telephone: (714) 786-5661

Via Email: sean.donovan@adv-geosolutions.com

Subject: Report of Laboratory Soils Testing for
AAA Parking Structure
640-700 27th St.
Los Angeles, California; Project Number (2001-03)

Mr. Donovan:

At your request, we have performed laboratory testing on soil samples provided to our facility. The following tests were performed:

- Percent Passing No. 200 Sieve: ASTM D 1140
- Summary of Chemical Testing: CT 417, 422, & 643
- Expansion Index Test: ASTM D 4829
- Report of Soil Sieve Analysis: ASTM D 1140 & D 6913
- In-Place Moisture and Density: ASTM D 2937
- Laboratory Compaction of Soil: ASTM D 1557
- Shear Strength Test: ASTM D 3080

Laboratory summary sheets providing the obtained results are attached herewith.

We appreciate the opportunity to be of service on this project. Should have any additional questions or comments, please contact our office.

Respectfully submitted,
CONSTRUCTION TESTING AND ENGINEERING, INC.

Dan T. Math, GE #2665, RCE #61013
Principal Engineer

DTM:ack

Attachment:
Laboratory Test Result Sheets (10 Sheet Total)






Project Name: AGS - AAA Parking Structure (2001-03)
 Job Number: 10-13575 Date Sampled: 2/1/2020
 Lab Number: 30450 Date Tested: 2/24/2020
 Tested By: LV, EC

Percent Passing No. 200 Sieve ASTM D1140

Boring Number:	B-1	B-1	B-2	B-4				
Depth:	5'	15'	10'	8'				
Total Sample Weight (g):	317.0	372.0	393.1	409.2				
Plus #4 Weight (g):	107.6	155.4	145.5	149.3				
Percent Retained Coarse Fraction (+ #4):	33.9	41.8	37.0	36.5				
Sample Weight (Finer Fraction)								
Weight of Moist Sample + Container (g):	397.7	263.8	582.0	488.2				
Weight of Dry Sample + Container (g):	384.3	252.5	571.9	477.8				
Weight of Container (g):	188.3	47.7	189.0	79.2				
Moisture Content (%):	6.8	5.5	2.6	2.6				
Weight After Wash								
Dry Weight of Sample + Container (g):	361.2	235.2	534.7	445.5				
Weight of Container (g):	188.3	47.7	189.0	79.2				
Dry Weight of Sample (gm):	172.9	187.5	345.7	366.3				
% Retained No. 200 Sieve	92.2	95.1	93.9	94.9				
% Passing No. 200 Sieve	7.8	4.9	6.1	5.1				

Reviewed By: 
 Erik Campbell
 Laboratory Manager

Date: February 26, 2020



Summary of Chemical Testing

Job Name: AGS - AAA Parking Structure (2001-03)
Job No: 10-13575 **Tested By:** John Ingle -PAE
Lab No: 30450 **Date Sampled:** 2/1/2020
Sample Location: B-1 @ 1-4' **Date Tested:** 3/6/2020

Analyte	Units	Results	Method
Sulfate	ppm	113.5	CT 417
Chloride	ppm	4.2	CT 422
p.H.	pH Units	8.17	CT 643
Resistivity	ohms.cm	3730	CT 643

Reviewed By:  Date: 3/10/2020
Erik Campbell
Laboratory Manager



Job Name: AGS- AAA Parking Structure (2001- 03)
 Job No: 10-13575L Tested By: LV
 Lab No: 30450 Date Sampled: 2/14/2020
 Soil Location: B-1 @ 1.0-4.0' Date Tested: 2/18/2020
 Soil Description: Dark Brown SM

LAB WORK SHEET

EXPANSION INDEX TEST

ASTM D 4829

TEST RESULTS

		Initial	Final
WET WEIGHT	(g)	200.4	419.8
DRY WEIGHT	(g)	187.1	366.2
% MOISTURE	(%)	7.1	14.6
WEIGHT OF RING & SOIL	(g)	778.4	
WEIGHT OF RING	(g)	365.3	
WEIGHT OF SOIL	(lbs.)	0.9107	
VOLUME OF RING	(ft. ³)	0.0073	
WET DENSITY	(pcf)	125.2	
DRY DENSITY	(pcf)	116.9	
% SATURATION	(%)	43.9	

EXPANSION READING

DATE _____ TIME: _____ INITIAL READING INCH

 FINAL READING

 EXPANSION INDEX

VERY LOW 0-20
 LOW 21-50
 MEDIUM 51 -90
 HIGH 91-130
 VERY HIGH 130>

NOTES: Equipment Id: 2A

El at saturation between 48-52%

Measured El: 0.5
 Measured Saturation: 43.9

El at 48-52% Saturation:




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Report of Soil Sieve Analysis						
Project Name: <u>AGS - AAA Parking Structure (2001-03)</u> Project Number: <u>10-13575</u> Date Sampled: <u>2/1/2020</u> Lab Number: <u>30450</u> Date Tested: <u>2/26/2020</u> Tested By: <u>EC, LV</u>					Sample Data: B-1 @ 1-4'	
Total Wet Wt: 17946.0 Total Dry Wt: 17538.2				Specifications: NA		
Sieve Size	Wt. (Grams)	% Retained	% Passing		Specifications	Remarks
2 inch (50.8 mm)	0.0	0	100			
1-1/2 inch (38.1 mm)	102.1	1	99			
1 inch (25.4 mm)	291.5	2	98			
3/4 inch (19.1 mm)	499.1	3	97			
1/2 inch (12.7 mm)	945.8	5	95			
3/8 inch (9.5 mm)	1246.2	7	93			
#4 (4.75 mm)	2022.0	12	88			
#8 (2.36 mm)	2704.3	15	85			
#16 (1.18 mm)	3446.8	20	80			
#30 (0.6 mm)	4737.0	27	73			
#50 (0.3 mm)	6453.5	37	63			
#100 (0.15 mm)	8675.2	49	51			
#200 (0.075 mm)	11354.8	64.7	35.3			

Tested in Accordance with ASTM D1140, D6913

Reviewed By: 
 Erik Campbell
 Laboratory Manager

Date: February 26, 2020




Construction Testing & Engineering, Inc.

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Report of Soil Sieve Analysis						
Project Name: <u>AGS - AAA Parking Structure (2001-03)</u> Project Number: <u>10-13575</u> Date Sampled: <u>2/1/2020</u> Lab Number: <u>30450</u> Date Tested: <u>2/21/2020</u> Tested By: <u>EC, LV</u>					Sample Data: B-1 @ 20'	
Total Wet Wt: 406.2 Total Dry Wt: 393.4				Specifications: NA		
Sieve Size	Wt. (Grams)	% Retained	% Passing		Specifications	Remarks
2 inch (50.8 mm)	0.0	0	100			
1-1/2 inch (38.1 mm)	0.0	0	100			
1 inch (25.4 mm)	0.0	0	100			
3/4 inch (19.1 mm)	50.9	13	87			
1/2 inch (12.7 mm)	80.8	21	79			
3/8 inch (9.5 mm)	101.9	26	74			
#4 (4.75 mm)	132.2	34	66			
#8 (2.36 mm)	170.2	43	57			
#16 (1.18 mm)	222.8	57	43			
#30 (0.6 mm)	278.4	71	29			
#50 (0.3 mm)	313.2	80	20			
#100 (0.15 mm)	335.9	85	15			
#200 (0.075 mm)	354.3	90.1	9.9			

Tested in Accordance with ASTM D1140, D6913

Reviewed By: 
 Erik Campbell
 Laboratory Manager

Date: February 26, 2020




Construction Testing & Engineering, Inc.

Inspection | Testing | Geotechnical | Environmental & Construction Engineering | Civil Engineering | Surveying

Report of Soil Sieve Analysis						
Project Name: <u>AGS - AAA Parking Structure (2001-03)</u> Project Number: <u>10-13575</u> Date Sampled: <u>2/1/2020</u> Lab Number: <u>30450</u> Date Tested: <u>2/24/2020</u> Tested By: <u>EC, LV</u>					Sample Data: B-2 @ 15'	
Total Wet Wt: 470.4 Total Dry Wt: 459.5				Specifications: NA		
Sieve Size	Wt. (Grams)	% Retained	% Passing		Specifications	Remarks
2 inch (50.8 mm)	0.0	0	100			
1-1/2 inch (38.1 mm)	0.0	0	100			
1 inch (25.4 mm)	0.0	0	100			
3/4 inch (19.1 mm)	33.2	7	93			
1/2 inch (12.7 mm)	83.0	18	82			
3/8 inch (9.5 mm)	106.4	23	77			
#4 (4.75 mm)	146.8	32	68			
#8 (2.36 mm)	193.1	42	58			
#16 (1.18 mm)	244.6	53	47			
#30 (0.6 mm)	297.3	65	35			
#50 (0.3 mm)	341.3	74	26			
#100 (0.15 mm)	379.5	83	17			
#200 (0.075 mm)	407.7	88.7	11.3			

Tested in Accordance with ASTM D1140, D6913

Reviewed By: 
 Erik Campbell
 Laboratory Manager

Date: February 26, 2020




Construction Testing & Engineering, Inc.

Inspection | Testing | Geotechnical | Environmental & Construction Engineering | Civil Engineering | Surveying

Report of Soil Sieve Analysis						
Project Name: <u>AGS - AAA Parking Structure (2001-03)</u> Project Number: <u>10-13575</u> Date Sampled: <u>2/1/2020</u> Lab Number: <u>30450</u> Date Tested: <u>2/21/2020</u> Tested By: <u>EC, LV</u>					Sample Data: B-3 @ 5'	
Total Wet Wt: 581.3 Total Dry Wt: 564.3				Specifications: NA		
Sieve Size	Wt. (Grams)	% Retained	% Passing		Specifications	Remarks
2 inch (50.8 mm)	0.0	0	100			
1-1/2 inch (38.1 mm)	0.0	0	100			
1 inch (25.4 mm)	0.0	0	100			
3/4 inch (19.1 mm)	16.2	3	97			
1/2 inch (12.7 mm)	21.5	4	96			
3/8 inch (9.5 mm)	43.1	8	92			
#4 (4.75 mm)	101.6	18	82			
#8 (2.36 mm)	164.4	29	71			
#16 (1.18 mm)	254.2	45	55			
#30 (0.6 mm)	346.8	61	39			
#50 (0.3 mm)	417.5	74	26			
#100 (0.15 mm)	468.8	83	17			
#200 (0.075 mm)	505.0	89.5	10.5			

Tested in Accordance with ASTM D1140, D6913

Reviewed By: 
 Erik Campbell
 Laboratory Manager

Date: February 26, 2020



Construction Testing & Engineering, Inc.

Inspection | Testing | Geotechnical | Environmental & Construction Engineering | Civil Engineering | Surveying

In Place Moisture & Density Test
In Accordance with ASTM D2937

Project Name: AGS - AAA Parking Structure (2001-03)
Job Number: 10-13575 **Date Sampled:** February 1, 2020
Lab Number: 30450 **Date Tested:** February 21, 2020

BORING NO.	B-1	B-2	B-2		
DEPTH (ft.)	15'	3'	7'		
SAMPLE HT. (in.)	6.0	1.0	1.0		
SOIL+RING (g)	1160.4	187.0	196.9		
WT. OF RINGS(g)	275.4	45.4	46.0		
WT. OF SOIL (g)	885.0	141.6	150.9		
WT. OF SOIL (lb.)	1.9511	0.3121	0.3327		
VOL. OF RINGS (ft. ³)	0.01592	0.00265	0.00265		
WET DENSITY (pcf)	122.6	117.7	125.4		
WET WT. (g)	363.0	379.7	332.3		
DRY WT. (g)	349.7	369.7	327.6		
TARE WT. (g)	79.3	76.6	49.2		
% MOISTURE	4.9	3.4	1.7		
DRY DENSITY (pcf)	116.8	113.8	123.3		

Tested By: JH, LS

Reviewed By: 
Erik Campbell, Laboratory Manager



LABORATORY COMPACTION OF SOIL (MOD.)

ASTM D 1557

Project Name: AGS - AAA Parking Structure (2001-03)
Project No.: 10-13575
Lab No.: 30450
Sample Location: B-1
Sample Description: Dark Brown (SM) w/ Gravel

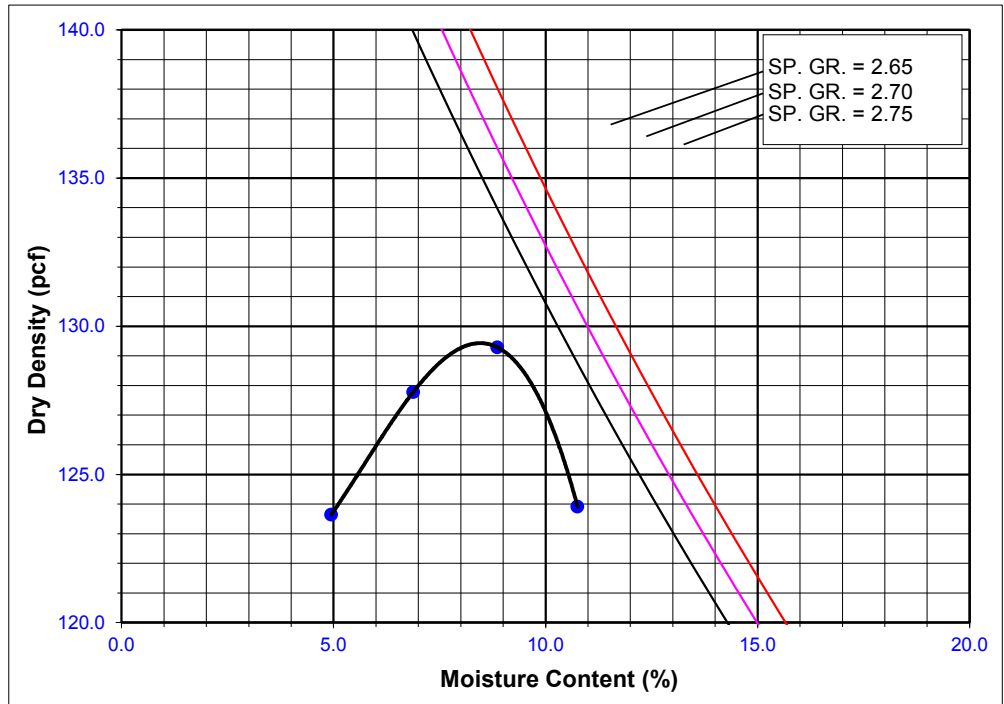
Tested By : JH **Date:** 2/17/2020
Calculated By : JH **Date:** 2/17/2020
Sampled By: AGS **Date:** 2/1/20
Depth (ft.) 1-4'

Moisture Added (ml)	100	150	200	50	
TEST NO.	1	2	3	4	
Wt. Comp. Soil + Mold (g)	4062	4125	4072	3959	
Wt. of Mold (g)	1999	1999	1999	1999	
Net Wt. of Soil (g)	2063	2126	2073	1960	
Wet Wt. of Soil + Cont. (g)	248.5	239.5	242.0	244.0	
Dry Wt. of Soil + Cont. (g)	232.5	220.0	218.5	232.5	
Wt. of Container (g)	0.0	0.0	0.0	0.0	
Moisture Content (%)	6.9	8.9	10.8	4.9	
Wet Density (pcf)	136.6	140.7	137.2	129.8	
Dry Density (pcf)	127.8	129.3	123.9	123.6	

Preparation Method: Dry Moist
Mechanical Rammer **Manual Rammer**
Hammer Weight:
Drop:
Mold Volume (ft.³):

PROCEDURE USED

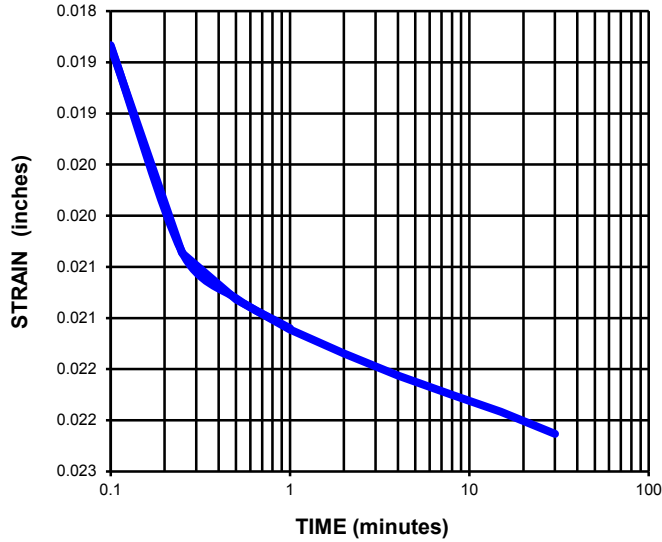
Procedure A
 Soil Passing No. 4 (4.75 mm) Sieve
 Mold : 4 in. (101.6 mm) diameter
 Layers : 5 (Five)
 Blows per layer : 25 (twenty-five)
 May be used if No.4 retained =/
 Procedure B
 Soil Passing 3/8 in. (9.5 mm) Sieve
 Mold : 4 in. (101.6 mm) diameter
 Layers : 5 (Five)
 Blows per layer : 25 (twenty-five)
 May be used if 3/8" retained =/
 Procedure C
 Soil Passing 3/4 in. (19.0 mm) Sieve
 Mold : 6 in. (152.4 mm) diameter
 Layers : 5 (Five)
 Blows per layer : 56 (fifty-six)
 May be used if 3/4" retained =/



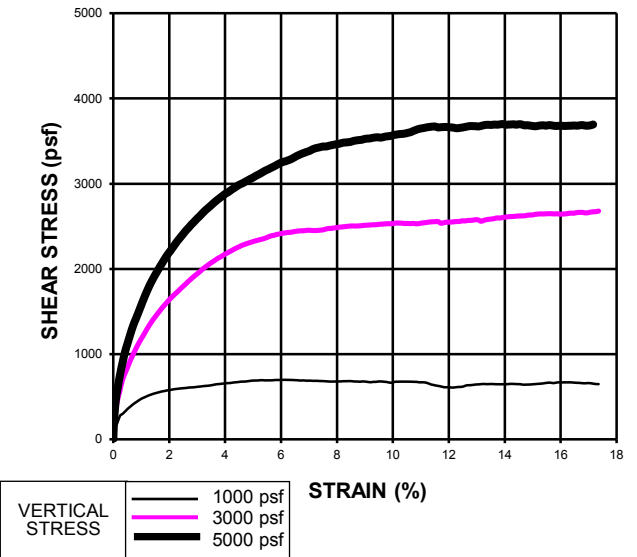
OVERSIZE FRACTION	
Total Sample Weight (g):	15924
Weight Retained (g)	Percent Retained
<input type="text" value=""/>	Plus 3/4" <input type="text" value="0.0"/>
<input type="text" value=""/>	Plus 3/8" <input type="text" value="0.0"/>
2174.5	Plus #4 <input type="text" value="13.7"/>

Maximum Dry Density (pcf)
Optimum Moisture Content (%)
Rock Correction Applied per ASTM D 4718
Maximum Dry Density (pcf)
Optimum Moisture Content (%)

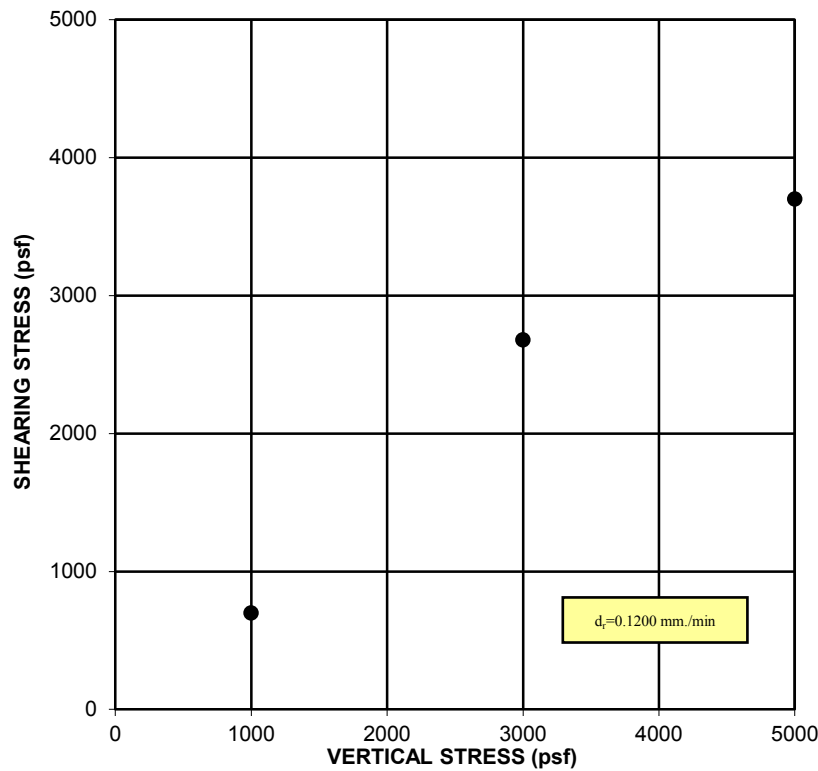
PRECONSOLIDATION



SHEARING DATA



FAILURE ENVELOPE



SHEAR STRENGTH TEST - ASTM D3080

Job Name: <u>AGS-AAA Parking (2001-03)</u>	Initial Dry Density (pcf): <u>116.5</u>
Project Number: <u>10-13575</u>	Sample Date: <u>2/1/2020</u>
Lab Number: <u>30450</u>	Test Date: <u>2/27/2020</u>
Sample Location: <u>B-1 @ 1-4'</u>	Tested by: <u>JH</u>
Sample Description: <u>Moderate Brown (SM) [Remold at 90% RC]</u>	Initial Moisture (%): <u>8.6</u>
	Final Moisture (%): <u>15.3</u>
	Cohesion: <u>100 psf</u>
	Angle Of Friction: <u>36.9</u>

APPENDIX D
ENGINEERING CALCULATIONS

ASPHALT CONCRETE PAVEMENT STRUCTURAL SECTION CALCULATIONS Onsite Driveways

Based on Caltrans Highway Design Manual 6th Ed. (20 year design life)

Design Values:

ASSUMED SUBGRADE SOILS R-VALUE **R = 40**
 AGGREGATE BASE (AB) R-VALUE **R = 78** (Class II or Equivalent)
Gf (AB) = 1.1

Design Calculations:

Gravel Equivalent (Total)

GE (total) = 0.0032 (TI)(100-R) (feet)

where TI= Traffic Index, R = R-Value

*Includes 0.2 feet added to GE(AC) as a "safety factor" for determining the minimum AC thickness

Gravel Factor (Gf)

for thickness ≤ 0.5 feet : $Gf = 5.67 / [(TI)^{0.5}]$

thickness > 0.5 feet : $Gf = 7.00 * [(t)^{1/3}]/(TI)^{0.5}$

*Minimum TI=5

TI	GE(total) (in)	GE(AC) (feet)	Gf(AC) (feet)	t (AC) (feet)	USE AC		GE(AB) (feet)	Gf(AB) (feet)	t (AB) (feet)	USE AB		Check GE(actual) > GE(total)	
					(feet)	(in)				(feet)	(in)		
4.5	0.86	0.52	2.54	0.20	0.25	3.0	0.23	1.10	0.21	0.33	4.0	1 ≥ 0.86	OK
4.5	0.86	0.52	2.54	0.20	0.33	4.0	0.02	1.10	0.02	0.33	4.0	1.21 ≥ 0.86	OK
4.5	0.86	0.52	2.54	0.20	0.42	5.0	-0.19	1.10	-0.18	0.00	0.0	1.06 ≥ 0.86	OK
6.0	1.15	0.62	2.31	0.27	0.50	6.0	-0.01	1.10	0.00	0.00	0.0	1.16 ≥ 1.15	OK

PLATE D-1



Latitude, Longitude: 34.0277, -118.2794



Date	3/9/2020, 12:05:59 PM
Design Code Reference Document	ASCE7-16
Risk Category	II
Site Class	C - Very Dense Soil and Soft Rock

Type	Value	Description
S_S	1.906	MCE_R ground motion. (for 0.2 second period)
S_1	0.676	MCE_R ground motion. (for 1.0s period)
S_{MS}	2.287	Site-modified spectral acceleration value
S_{M1}	0.946	Site-modified spectral acceleration value
S_{DS}	1.525	Numeric seismic design value at 0.2 second SA
S_{D1}	0.631	Numeric seismic design value at 1.0 second SA

Type	Value	Description
SDC	D	Seismic design category
F_a	1.2	Site amplification factor at 0.2 second
F_v	1.4	Site amplification factor at 1.0 second
PGA	0.813	MCE_G peak ground acceleration
F_{PGA}	1.2	Site amplification factor at PGA
PGA_M	0.976	Site modified peak ground acceleration
T_L	8	Long-period transition period in seconds
S_{sRT}	1.906	Probabilistic risk-targeted ground motion. (0.2 second)
S_{sUH}	2.105	Factored uniform-hazard (2% probability of exceedance in 50 years) spectral acceleration
S_{sD}	2.387	Factored deterministic acceleration value. (0.2 second)
S_{1RT}	0.676	Probabilistic risk-targeted ground motion. (1.0 second)
S_{1UH}	0.749	Factored uniform-hazard (2% probability of exceedance in 50 years) spectral acceleration.
S_{1D}	0.784	Factored deterministic acceleration value. (1.0 second)
$PGAd$	0.97	Factored deterministic acceleration value. (Peak Ground Acceleration)
C_{RS}	0.906	Mapped value of the risk coefficient at short periods
C_{R1}	0.902	Mapped value of the risk coefficient at a period of 1 s

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APPENDIX E
GENERAL EARTHWORK SPECIFICATIONS

GENERAL EARTHWORK SPECIFICATIONS

I. General

A. General procedures and requirements for earthwork and grading are presented herein. The earthwork and grading recommendations provided in the geotechnical report are considered part of these specifications, and where the general specifications provided herein conflict with those provided in the geotechnical report, the recommendations in the geotechnical report shall govern. Recommendations provided herein and in the geotechnical report may need to be modified depending on the conditions encountered during grading.

B. The contractor is responsible for the satisfactory completion of all earthwork in accordance with the project plans, specifications, applicable building codes, and local governing agency requirements. Where these requirements conflict, the stricter requirements shall govern.

C. It is the contractor's responsibility to read and understand the guidelines presented herein and in the geotechnical report as well as the project plans and specifications. Information presented in the geotechnical report is subject to verification during grading. The information presented on the exploration logs depict conditions at the particular time of excavation and at the location of the excavation. Subsurface conditions present at other locations may differ, and the passage of time may result in different subsurface conditions being encountered at the locations of the exploratory excavations. The contractor shall perform an independent investigation and evaluate the nature of the surface and subsurface conditions to be encountered and the procedures and equipment to be used in performing his work.

D. The contractor shall have the responsibility to provide adequate equipment and procedures to accomplish the earthwork in accordance with applicable requirements. When the quality of work is less than that required, the Geotechnical Consultant may reject the work and may recommend that the operations be suspended until the conditions are corrected.

E. Prior to the start of grading, a qualified Geotechnical Consultant should be employed to observe grading procedures and provide testing of the fills for conformance with the project specifications, approved grading plan, and guidelines presented herein. All clearing and grubbing, remedial removals, clean-outs, removal bottoms, keyways, and subdrain installations should be observed and documented by the Geotechnical Consultant prior to placing fill. It is the contractor's responsibility to apprise the Geotechnical Consultant of their schedules and notify the Geotechnical Consultant when those areas are ready for observation.

F. The contractor is responsible for providing a safe environment for the Geotechnical Consultant to observe grading and conduct tests.

II. Site Preparation

A. Clearing and Grubbing: Excessive vegetation and other deleterious material shall be sufficiently removed as required by the Geotechnical Consultant, and such materials shall be

properly disposed of offsite in a method acceptable to the owner and governing agencies. Where applicable, the contractor may obtain permission from the Geotechnical Consultant, owner, and governing agencies to dispose of vegetation and other deleterious materials in designated areas onsite.

B. Unsuitable Soils Removals: Earth materials that are deemed unsuitable for the support of fill shall be removed as necessary to the satisfaction of the Geotechnical Consultant.

C. Any underground structures such as cesspools, cisterns, mining shafts, tunnels, septic tanks, wells, pipelines, other utilities, or other structures located within the limits of grading shall be removed and/or abandoned in accordance with the requirements of the governing agency and to the satisfaction of the Geotechnical Consultant. Environmental evaluation of existing conditions is not the responsibility of the Geotechnical Consultant.

D. Preparation of Areas to Receive Fill: After removals are completed, the exposed surfaces shall be processed or scarified to a depth of approximately 8 inches, watered or dried, as needed, to achieve a generally uniform moisture content that is at or near optimum moisture content. The scarified materials shall then be compacted to the project requirements and tested as specified.

E. All areas receiving fill shall be observed and approved by the Geotechnical Consultant prior to the placement of fill. A licensed surveyor shall provide survey control for determining elevations of processed areas and keyways.

III. Placement of Fill

A. Suitability of fill materials: Any materials, derived onsite or imported, may be utilized as fill provided that the materials have been determined to be suitable by the Geotechnical Consultant. Such materials shall be essentially free of organic matter and other deleterious materials, and be of a gradation, expansion potential, and/or strength that is acceptable to the Geotechnical Consultant. Fill materials shall be tested in a laboratory approved by the Geotechnical Consultant, and import materials shall be tested and approved prior to being imported.

B. Generally, different fill materials shall be thoroughly mixed to provide a relatively uniform blend of materials and prevent abrupt changes in material type. Fill materials derived from benching should be dispersed throughout the fill area instead of placing the materials within only an equipment-width from the cut/fill contact.

C. Oversize Materials: Rocks greater than 12 inches in largest dimension shall be disposed of offsite or be placed in accordance with the recommendations by the Geotechnical Consultant in the areas that are designated as suitable for oversize rock placement. Rocks that are smaller than 8 inches in largest dimension may be utilized in the fill provided that they are not nested and are their quantity and distribution are acceptable to the Geotechnical Consultant and do not inhibit the ability to properly compact fill materials.

D. The fill materials shall be placed in thin, horizontal layers such that, when compacted, shall not exceed 6 inches. Each layer shall be spread evenly and shall be thoroughly mixed to obtain a near uniform moisture content and uniform blend of materials.

E. Moisture Content: Fill materials shall be placed at or above the optimum moisture content or as recommended by the geotechnical report. Where the moisture content of the engineered fill is less than recommended, water shall be added, and the fill materials shall be blended so that a near uniform moisture content is achieved. If the moisture content is above the limits specified by the Geotechnical Consultant, the fill materials shall be aerated by discing, blading, or other methods until the moisture content is acceptable.

F. Each layer of fill shall be compacted to the project standards in accordance to the project specifications and recommendations of the Geotechnical Consultant. Unless otherwise specified by the Geotechnical Consultant, the fill shall be compacted to a minimum of 90 percent of the maximum dry density as determined by ASTM Test Method: D1557-09.

G. Benching: Where placing fill on a slope exceeding a ratio of 5 to 1 (horizontal to vertical), the ground should be keyed or benched. The keyways and benches shall extend through all unsuitable materials into suitable materials such as firm materials or sound bedrock or as recommended by the Geotechnical Consultant. The minimum keyway width shall be 15 feet and extend into suitable materials, or as recommended by the geotechnical report and approved by the Geotechnical Consultant. The minimum keyway width for fill over cut slopes is also 15 feet, or as recommended by the geotechnical report and approved by the Geotechnical Consultant. As a general rule, unless otherwise recommended by the Geotechnical Consultant, the minimum width of the keyway shall be equal to $\frac{1}{2}$ the height of the fill slope.

H. Slope Face: The specified minimum relative compaction shall be maintained out to the finish face of fill and stabilization fill slopes. Generally, this may be achieved by overbuilding the slope and cutting back to the compacted core. The actual amount of overbuilding may vary as field conditions dictate. Alternately, this may be achieved by backrolling the slope face with suitable equipment or other methods that produce the designated result. Loose soil should not be allowed to build up on the slope face. If present, loose soils shall be trimmed to expose the compacted slope face.

I. Slope Ratio: Unless otherwise approved by the Geotechnical Consultant and governing agencies, permanent fill slopes shall be designed and constructed no steeper than 2 to 1 (horizontal to vertical).

J. Natural Ground and Cut Areas: Design grades that are in natural ground or in cuts should be evaluated by the Geotechnical Consultant to determine whether scarification and processing of the ground and/or overexcavation is needed.

K. Fill materials shall not be placed, spread, or compacted during unfavorable weather conditions. When grading is interrupted by rain, filing operations shall not resume until the Geotechnical Consultant approves the moisture and density of the previously placed compacted fill.

IV. Cut Slopes

A. The Geotechnical Consultant shall observe all cut slopes, including fill over cut slopes, and shall be notified by the contractor when cut slopes are started.

B. If adverse or potentially adverse conditions are encountered during grading, the Geotechnical Consultant shall investigate, evaluate, and make recommendations to mitigate the adverse conditions.

C. Unless otherwise stated in the geotechnical report, cut slopes shall not be excavated higher or steeper than the requirements of the local governing agencies. Short-term stability of the cut slopes and other excavations is the contractor's responsibility.

V. Drainage

A. Backdrains and Subdrains: Backdrains and subdrains shall be provided in fill as recommended by the Geotechnical Consultant and shall be constructed in accordance with the governing agency and/or recommendations of the Geotechnical Consultant. The location of subdrains, especially outlets, shall be surveyed and recorded by the Civil Engineer.

B. Top-of-slope Drainage: Positive drainage shall be established away from the top of slope. Site drainage shall not be permitted to flow over the tops of slopes.

C. Drainage terraces shall be constructed in compliance with the governing agency requirements and/or in accordance with the recommendations of the Civil Engineer.

D. Non-erodible interceptor swales shall be placed at the top of cut slopes that face the same direction as the prevailing drainage.

VI. Erosion Control

A. All finish cut and fill slopes shall be protected from erosion and/or planted in accordance with the project specifications and/or landscape architect's recommendations. Such measures to protect the slope face shall be undertaken as soon as practical after completion of grading.

B. During construction, the contractor shall maintain proper drainage and prevent the ponding of water. The contractor shall take remedial measures to prevent the erosion of graded areas until permanent drainage and erosion control measures have been installed.

VII. Trench Excavation and Backfill

A. Safety: The contractor shall follow all OSHA requirements for safety of trench excavations. Knowing and following these requirements is the contractor's responsibility. All trench excavations or open cuts in excess of 5 feet in depth shall be shored or laid back. Trench excavations and open cuts exposing adverse geologic conditions may require further evaluation

by the Geotechnical Consultant. If a contractor fails to provide safe access for compaction testing, backfill not tested due to safety concerns may be subject to removal.

B. Bedding: Bedding materials shall be non-expansive and have a Sand Equivalent greater than 30. Where permitted by the Geotechnical Consultant, the bedding materials can be densified by jetting.

C. Backfill: Jetting of backfill materials to achieve compaction is generally not acceptable. Where permitted by the Geotechnical Consultant, the bedding materials can be densified by jetting provided the backfill materials are granular, free-draining and have a Sand Equivalent greater than 30.

VIII. Geotechnical Observation and Testing During Grading

A. Compaction Testing: Fill will be tested and evaluated by the Geotechnical Consultant for evaluation of general compliance with the recommended compaction and moisture conditions. The tests shall be taken in the compacted soils beneath the surface if the surficial materials are disturbed. The contractor shall assist the Geotechnical Consultant by excavating suitable test pits for testing of compacted fill.

B. Where tests indicate that the density of a layer of fill is less than required, or the moisture content is not within specifications, the Geotechnical Consultant shall notify the contractor of the unsatisfactory conditions of the fill. The portions of the fill that are not within specifications shall be reworked until the required density and/or moisture content has been attained. No additional fill shall be placed until the last lift of fill is tested and found to meet the project specifications and approved by the Geotechnical Consultant.

C. If, in the opinion of the Geotechnical Consultant, unsatisfactory conditions, such as adverse weather, excessive rock or deleterious materials being placed in the fill, insufficient equipment, excessive rate of fill placement, results in a quality of work that is unacceptable, the consultant shall notify the contractor, and the contractor shall rectify the conditions, and if necessary, stop work until conditions are satisfactory.

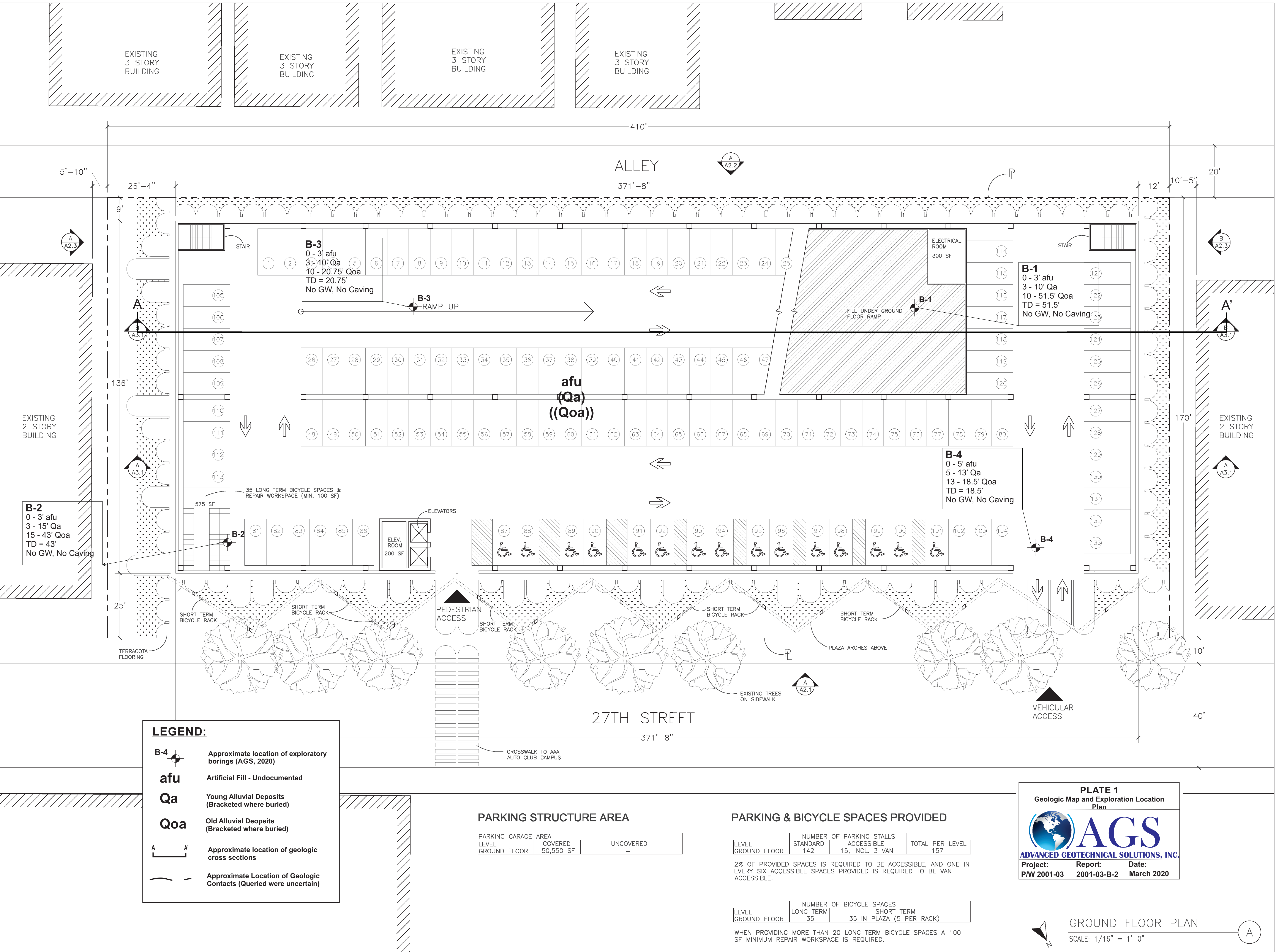
D. Frequency of Compaction Testing: The location and frequency of tests shall be at the Geotechnical Consultant's discretion. Generally, compaction tests shall be taken at intervals approximately two feet in fill height.

E. Compaction Test Locations: The Geotechnical Consultant shall document the approximate elevation and horizontal coordinates of the compaction test locations. The contractor shall coordinate with the surveyor to assure that sufficient grade stakes are established so that the Geotechnical Consultant can determine the test locations. Alternately, the test locations can be surveyed and the results provided to the Geotechnical Consultant.

F. Areas of fill that have not been observed or tested by the Geotechnical Consultant may have to be removed and recompacted at the contractor's expense. The depth and extent of removals will be determined by the Geotechnical Consultant.

G. Observation and testing by the Geotechnical Consultant shall be conducted during grading in order for the Geotechnical Consultant to state that, in his opinion, grading has been completed in accordance with the approved geotechnical report and project specifications.

H. Reporting of Test Results: After completion of grading operations, the Geotechnical Consultant shall submit reports documenting their observations during construction and test results. These reports may be subject to review by the local governing agencies.



ENTITLEMENT SET

PRINT RECORD:	DATE	DESCRIPTION	REV.
	10/22/2019	PLANNING SUBMITTAL	

PROJECT NAME:
AAA Parking Structure

PROJECT LOCATION:
 640-700 W. 27TH STREET,
 LOS ANGELES, CA 90007

SHEET TITLE:
GROUND FLOOR PLAN

SHEET NUMBER:
A1.2

PLATE 1
 Geologic Map and Exploration Location Plan

AGS
 ADVANCED GEOTECHNICAL SOLUTIONS, INC.

Project: P/W 2001-03 Report: 2001-03-B-2 Date: March 2020

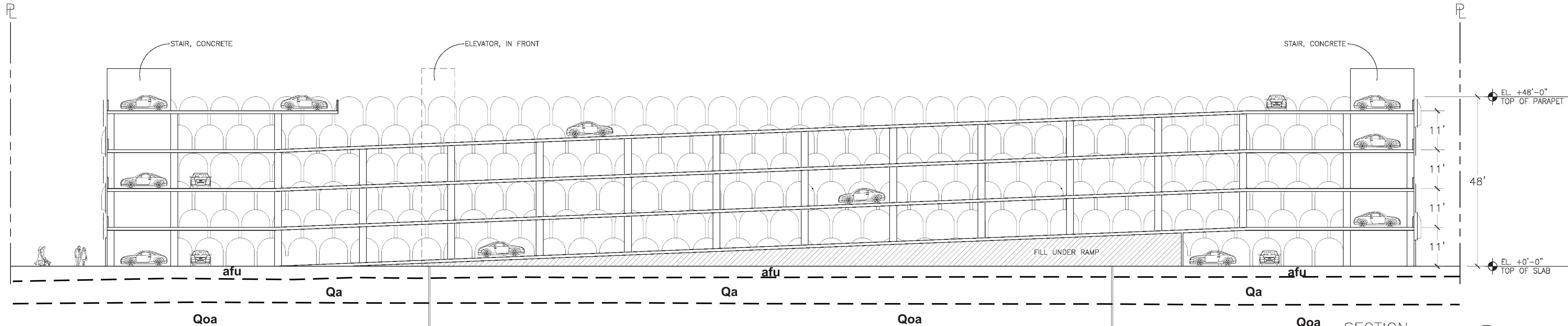
ENTITLEMENT SET

DATE	DESCRIPTION	REV.
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 PROJECT LOCATION:
 640-700 W. 27TH STREET,
 LOS ANGELES, CA 90007

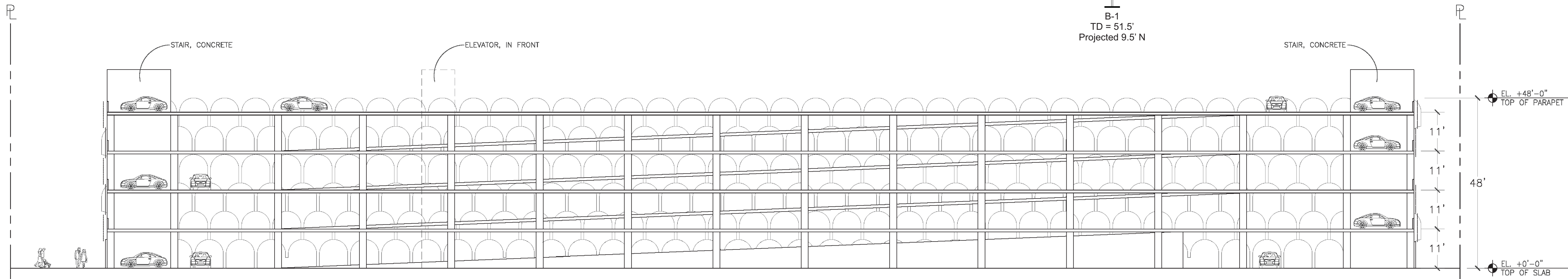
SHEET TITLE:
 SECTION

SHEET NUMBER:
A3.1



Geologic Cross-Section A-A'


SECTION **B**
 SCALE: 1/16" = 1'-0"



SECTION **A**
 SCALE: 1/16" = 1'-0"

SEE PLATE 1 FOR LEGEND

PLATE 2
 Geologic Cross-Section A-A'



AGS
 ADVANCED GEOTECHNICAL SOLUTIONS, INC.

Project: P/W 2001-03 Report: 2001-03-B-2 Date: March 2020

APPENDIX D: GREENHOUSE GAS EMISSIONS WORKSHEETS

AAA Parking Structure - South Coast AQMD Air District, Annual

AAA Parking Structure

South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking with Elevator	750.00	Space	1.60	202,200.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	11			Operational Year	2021
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 - Project data per architectural plan submittal package dated Oct 22, 219.

Construction Phase - Construction timeline assumes start of construction in fourth quarter of 2020 and an approximate 12 month buildout (completed in 2021).

Grading - Assumes 11,233 cy of soil export for earthwork and foundation preparation.

Demolition - Assumes demo of 69,931 sf of asphalt parking lot = 1,291 cy of debris (eq. to 1,550 tons)

Trips and VMT - Hauling trips conservatively estimated based on 14 cy hauling capacity. Assumes 1,291 cy of asphalt debris during demolition, 11,233 cy of soil export during grading, and 393 tons of C&D debris during construction.

Construction Off-road Equipment Mitigation - Mitigation scenario includes compliance with Rule 403 (dust suppression)

AAA Parking Structure - South Coast AQMD Air District, Annual

Table Name	Column Name	Default Value	New Value
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tblConstructionPhase	NumDays	200.00	180.00
tblConstructionPhase	NumDays	20.00	10.00
tblConstructionPhase	NumDays	4.00	30.00
tblConstructionPhase	PhaseEndDate	8/10/2021	8/17/2021
tblConstructionPhase	PhaseEndDate	7/13/2021	7/5/2021
tblConstructionPhase	PhaseEndDate	9/28/2020	9/14/2020
tblConstructionPhase	PhaseEndDate	10/6/2020	10/26/2020
tblConstructionPhase	PhaseStartDate	10/7/2020	10/27/2020
tblConstructionPhase	PhaseStartDate	10/1/2020	9/15/2020
tblGrading	MaterialExported	0.00	11,233.00
tblLandUse	LandUseSquareFeet	300,000.00	202,200.00
tblLandUse	LotAcreage	6.75	1.60
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripLength	20.00	30.00
tblTripsAndVMT	HaulingTripNumber	153.00	184.00
tblTripsAndVMT	HaulingTripNumber	1,404.00	1,604.00
tblTripsAndVMT	HaulingTripNumber	0.00	68.00

2.0 Emissions Summary

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	9-1-2020	11-30-2020	0.9631	0.9631
2	12-1-2020	2-28-2021	0.6452	0.6452
3	3-1-2021	5-31-2021	0.6383	0.6383
4	6-1-2021	8-31-2021	0.3277	0.3277
		Highest	0.9631	0.9631

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	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	218.4782	218.4782	5.1600e-003	1.0700e-003	218.9253
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0168	9.0000e-005	9.6100e-003	0.0000	0.0000	3.0000e-005	3.0000e-005	0.0000	3.0000e-005	3.0000e-005	0.0000	218.4968	218.4968	5.2100e-003	1.0700e-003	218.9452

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	218.4782	218.4782	5.1600e-003	1.0700e-003	218.9253
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0168	9.0000e-005	9.6100e-003	0.0000	0.0000	3.0000e-005	3.0000e-005	0.0000	3.0000e-005	3.0000e-005	0.0000	218.4968	218.4968	5.2100e-003	1.0700e-003	218.9452

	ROG	NOx	CO	SO2	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

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2020	9/14/2020	5	10	
2	Grading	Grading	9/15/2020	10/26/2020	5	30	
3	Building Construction	Building Construction	10/27/2020	7/5/2021	5	180	
4	Paving	Paving	7/14/2021	7/27/2021	5	10	
5	Architectural Coating	Architectural Coating	7/28/2021	8/17/2021	5	15	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 11.25

Acres of Paving: 1.6

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 12,132 (Architectural Coating – sqft)

OffRoad Equipment

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

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	5	13.00	0.00	184.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	1,604.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	85.00	33.00	68.00	14.70	6.90	30.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	17.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

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3.1 Mitigation Measures Construction

Water Exposed Area

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					0.0166	0.0000	0.0166	2.5100e-003	0.0000	2.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0106	0.1047	0.0733	1.2000e-004		5.7600e-003	5.7600e-003		5.3800e-003	5.3800e-003	0.0000	10.5338	10.5338	2.7100e-003	0.0000	10.6015
Total	0.0106	0.1047	0.0733	1.2000e-004	0.0166	5.7600e-003	0.0223	2.5100e-003	5.3800e-003	7.8900e-003	0.0000	10.5338	10.5338	2.7100e-003	0.0000	10.6015

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3.2 Demolition - 2020

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	9.8000e-004	0.0343	7.1200e-003	1.0000e-004	2.3700e-003	1.2000e-004	2.4900e-003	6.5000e-004	1.1000e-004	7.7000e-004	0.0000	9.9385	9.9385	6.3000e-004	0.0000	9.9544
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	2.9000e-004	2.2000e-004	2.4600e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6420	0.6420	2.0000e-005	0.0000	0.6424
Total	1.2700e-003	0.0345	9.5800e-003	1.1000e-004	3.0800e-003	1.3000e-004	3.2100e-003	8.4000e-004	1.2000e-004	9.6000e-004	0.0000	10.5805	10.5805	6.5000e-004	0.0000	10.5968

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					6.4700e-003	0.0000	6.4700e-003	9.8000e-004	0.0000	9.8000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0106	0.1047	0.0733	1.2000e-004		5.7600e-003	5.7600e-003		5.3800e-003	5.3800e-003	0.0000	10.5338	10.5338	2.7100e-003	0.0000	10.6015
Total	0.0106	0.1047	0.0733	1.2000e-004	6.4700e-003	5.7600e-003	0.0122	9.8000e-004	5.3800e-003	6.3600e-003	0.0000	10.5338	10.5338	2.7100e-003	0.0000	10.6015

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3.2 Demolition - 2020

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	9.8000e-004	0.0343	7.1200e-003	1.0000e-004	2.3700e-003	1.2000e-004	2.4900e-003	6.5000e-004	1.1000e-004	7.7000e-004	0.0000	9.9385	9.9385	6.3000e-004	0.0000	9.9544
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	2.9000e-004	2.2000e-004	2.4600e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	1.0000e-005	1.9000e-004	0.0000	0.6420	0.6420	2.0000e-005	0.0000	0.6424
Total	1.2700e-003	0.0345	9.5800e-003	1.1000e-004	3.0800e-003	1.3000e-004	3.2100e-003	8.4000e-004	1.2000e-004	9.6000e-004	0.0000	10.5805	10.5805	6.5000e-004	0.0000	10.5968

3.3 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	tons/yr										MT/yr					
Fugitive Dust					0.0744	0.0000	0.0744	0.0380	0.0000	0.0380	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0203	0.2263	0.0968	2.1000e-004		0.0103	0.0103		9.4400e-003	9.4400e-003	0.0000	18.5844	18.5844	6.0100e-003	0.0000	18.7347
Total	0.0203	0.2263	0.0968	2.1000e-004	0.0744	0.0103	0.0846	0.0380	9.4400e-003	0.0474	0.0000	18.5844	18.5844	6.0100e-003	0.0000	18.7347

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3.3 Grading - 2020

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	8.5200e-003	0.2990	0.0621	8.8000e-004	0.0207	1.0400e-003	0.0217	5.6700e-003	1.0000e-003	6.6700e-003	0.0000	86.6376	86.6376	5.5400e-003	0.0000	86.7760
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	5.4000e-004	4.1000e-004	4.5400e-003	1.0000e-005	1.3200e-003	1.0000e-005	1.3300e-003	3.5000e-004	1.0000e-005	3.6000e-004	0.0000	1.1852	1.1852	3.0000e-005	0.0000	1.1861
Total	9.0600e-003	0.2994	0.0666	8.9000e-004	0.0220	1.0500e-003	0.0231	6.0200e-003	1.0100e-003	7.0300e-003	0.0000	87.8228	87.8228	5.5700e-003	0.0000	87.9620

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0290	0.0000	0.0290	0.0148	0.0000	0.0148	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0203	0.2263	0.0968	2.1000e-004		0.0103	0.0103		9.4400e-003	9.4400e-003	0.0000	18.5844	18.5844	6.0100e-003	0.0000	18.7346
Total	0.0203	0.2263	0.0968	2.1000e-004	0.0290	0.0103	0.0393	0.0148	9.4400e-003	0.0243	0.0000	18.5844	18.5844	6.0100e-003	0.0000	18.7346

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3.3 Grading - 2020

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	8.5200e-003	0.2990	0.0621	8.8000e-004	0.0207	1.0400e-003	0.0217	5.6700e-003	1.0000e-003	6.6700e-003	0.0000	86.6376	86.6376	5.5400e-003	0.0000	86.7760
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	5.4000e-004	4.1000e-004	4.5400e-003	1.0000e-005	1.3200e-003	1.0000e-005	1.3300e-003	3.5000e-004	1.0000e-005	3.6000e-004	0.0000	1.1852	1.1852	3.0000e-005	0.0000	1.1861
Total	9.0600e-003	0.2994	0.0666	8.9000e-004	0.0220	1.0500e-003	0.0231	6.0200e-003	1.0100e-003	7.0300e-003	0.0000	87.8228	87.8228	5.5700e-003	0.0000	87.9620

3.4 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	0.0487	0.3549	0.3165	5.3000e-004		0.0191	0.0191		0.0185	0.0185	0.0000	43.5701	43.5701	8.0900e-003	0.0000	43.7723
Total	0.0487	0.3549	0.3165	5.3000e-004		0.0191	0.0191		0.0185	0.0185	0.0000	43.5701	43.5701	8.0900e-003	0.0000	43.7723

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3.4 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-004	3.3800e-003	7.0000e-004	1.0000e-005	7.2000e-004	1.0000e-005	7.3000e-004	1.8000e-004	1.0000e-005	1.9000e-004	0.0000	0.9794	0.9794	6.0000e-005	0.0000	0.9810
Vendor	2.6500e-003	0.0845	0.0209	2.0000e-004	4.9900e-003	4.1000e-004	5.4100e-003	1.4400e-003	4.0000e-004	1.8400e-003	0.0000	19.4794	19.4794	1.2800e-003	0.0000	19.5114
Worker	9.1100e-003	6.9800e-003	0.0773	2.2000e-004	0.0224	1.7000e-004	0.0226	5.9400e-003	1.6000e-004	6.1000e-003	0.0000	20.1484	20.1484	5.8000e-004	0.0000	20.1628
Total	0.0119	0.0949	0.0989	4.3000e-004	0.0281	5.9000e-004	0.0287	7.5600e-003	5.7000e-004	8.1300e-003	0.0000	40.6072	40.6072	1.9200e-003	0.0000	40.6552

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	0.0487	0.3549	0.3165	5.3000e-004		0.0191	0.0191		0.0185	0.0185	0.0000	43.5701	43.5701	8.0900e-003	0.0000	43.7723
Total	0.0487	0.3549	0.3165	5.3000e-004		0.0191	0.0191		0.0185	0.0185	0.0000	43.5701	43.5701	8.0900e-003	0.0000	43.7723

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3.4 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.0000e-004	3.3800e-003	7.0000e-004	1.0000e-005	7.2000e-004	1.0000e-005	7.3000e-004	1.8000e-004	1.0000e-005	1.9000e-004	0.0000	0.9794	0.9794	6.0000e-005	0.0000	0.9810
Vendor	2.6500e-003	0.0845	0.0209	2.0000e-004	4.9900e-003	4.1000e-004	5.4100e-003	1.4400e-003	4.0000e-004	1.8400e-003	0.0000	19.4794	19.4794	1.2800e-003	0.0000	19.5114
Worker	9.1100e-003	6.9800e-003	0.0773	2.2000e-004	0.0224	1.7000e-004	0.0226	5.9400e-003	1.6000e-004	6.1000e-003	0.0000	20.1484	20.1484	5.8000e-004	0.0000	20.1628
Total	0.0119	0.0949	0.0989	4.3000e-004	0.0281	5.9000e-004	0.0287	7.5600e-003	5.7000e-004	8.1300e-003	0.0000	40.6072	40.6072	1.9200e-003	0.0000	40.6552

3.4 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	0.1196	0.9000	0.8514	1.4600e-003		0.0452	0.0452		0.0436	0.0436	0.0000	119.8214	119.8214	0.0214	0.0000	120.3562
Total	0.1196	0.9000	0.8514	1.4600e-003		0.0452	0.0452		0.0436	0.0436	0.0000	119.8214	119.8214	0.0214	0.0000	120.3562

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3.4 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5000e-004	8.5800e-003	1.9100e-003	3.0000e-005	8.2000e-004	3.0000e-005	8.5000e-004	2.2000e-004	3.0000e-005	2.5000e-004	0.0000	2.6650	2.6650	1.7000e-004	0.0000	2.6692
Vendor	6.2000e-003	0.2107	0.0523	5.5000e-004	0.0137	4.2000e-004	0.0142	3.9600e-003	4.1000e-004	4.3700e-003	0.0000	53.1751	53.1751	3.3600e-003	0.0000	53.2592
Worker	0.0234	0.0173	0.1955	5.9000e-004	0.0616	4.6000e-004	0.0620	0.0164	4.3000e-004	0.0168	0.0000	53.6125	53.6125	1.4400e-003	0.0000	53.6485
Total	0.0298	0.2366	0.2497	1.1700e-003	0.0761	9.1000e-004	0.0770	0.0205	8.7000e-004	0.0214	0.0000	109.4526	109.4526	4.9700e-003	0.0000	109.5769

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	0.1196	0.9000	0.8514	1.4600e-003		0.0452	0.0452		0.0436	0.0436	0.0000	119.8213	119.8213	0.0214	0.0000	120.3561
Total	0.1196	0.9000	0.8514	1.4600e-003		0.0452	0.0452		0.0436	0.0436	0.0000	119.8213	119.8213	0.0214	0.0000	120.3561

AAA Parking Structure - South Coast AQMD Air District, Annual

3.4 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5000e-004	8.5800e-003	1.9100e-003	3.0000e-005	8.2000e-004	3.0000e-005	8.5000e-004	2.2000e-004	3.0000e-005	2.5000e-004	0.0000	2.6650	2.6650	1.7000e-004	0.0000	2.6692
Vendor	6.2000e-003	0.2107	0.0523	5.5000e-004	0.0137	4.2000e-004	0.0142	3.9600e-003	4.1000e-004	4.3700e-003	0.0000	53.1751	53.1751	3.3600e-003	0.0000	53.2592
Worker	0.0234	0.0173	0.1955	5.9000e-004	0.0616	4.6000e-004	0.0620	0.0164	4.3000e-004	0.0168	0.0000	53.6125	53.6125	1.4400e-003	0.0000	53.6485
Total	0.0298	0.2366	0.2497	1.1700e-003	0.0761	9.1000e-004	0.0770	0.0205	8.7000e-004	0.0214	0.0000	109.4526	109.4526	4.9700e-003	0.0000	109.5769

3.5 Paving - 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	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291

AAA Parking Structure - South Coast AQMD Air District, Annual

3.5 Paving - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.7000e-004	2.0000e-004	2.2700e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.6212	0.6212	2.0000e-005	0.0000	0.6216
Total	2.7000e-004	2.0000e-004	2.2700e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.6212	0.6212	2.0000e-005	0.0000	0.6216

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	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291

AAA Parking Structure - South Coast AQMD Air District, Annual

3.5 Paving - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.7000e-004	2.0000e-004	2.2700e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.6212	0.6212	2.0000e-005	0.0000	0.6216
Total	2.7000e-004	2.0000e-004	2.2700e-003	1.0000e-005	7.1000e-004	1.0000e-005	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.6212	0.6212	2.0000e-005	0.0000	0.6216

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	tons/yr										MT/yr					
Archit. Coating	0.0281					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6400e-003	0.0115	0.0136	2.0000e-005		7.1000e-004	7.1000e-004		7.1000e-004	7.1000e-004	0.0000	1.9149	1.9149	1.3000e-004	0.0000	1.9182
Total	0.0298	0.0115	0.0136	2.0000e-005		7.1000e-004	7.1000e-004		7.1000e-004	7.1000e-004	0.0000	1.9149	1.9149	1.3000e-004	0.0000	1.9182

AAA Parking Structure - South Coast AQMD Air District, Annual

3.6 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	3.9000e-004	4.4400e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.2185	1.2185	3.0000e-005	0.0000	1.2193
Total	5.3000e-004	3.9000e-004	4.4400e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.2185	1.2185	3.0000e-005	0.0000	1.2193

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	0.0281					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6400e-003	0.0115	0.0136	2.0000e-005		7.1000e-004	7.1000e-004		7.1000e-004	7.1000e-004	0.0000	1.9149	1.9149	1.3000e-004	0.0000	1.9182
Total	0.0298	0.0115	0.0136	2.0000e-005		7.1000e-004	7.1000e-004		7.1000e-004	7.1000e-004	0.0000	1.9149	1.9149	1.3000e-004	0.0000	1.9182

AAA Parking Structure - South Coast AQMD Air District, Annual

3.6 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.3000e-004	3.9000e-004	4.4400e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.2185	1.2185	3.0000e-005	0.0000	1.2193
Total	5.3000e-004	3.9000e-004	4.4400e-003	1.0000e-005	1.4000e-003	1.0000e-005	1.4100e-003	3.7000e-004	1.0000e-005	3.8000e-004	0.0000	1.2185	1.2185	3.0000e-005	0.0000	1.2193

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

AAA Parking Structure - South Coast AQMD Air District, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Unenclosed Parking with Elevator	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

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
Unenclosed Parking with	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
Unenclosed Parking with Elevator	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

5.0 Energy Detail

AAA Parking Structure - South Coast AQMD Air District, Annual

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Unenclosed Parking with Elevator	392268	218.4782	5.1600e-003	1.0700e-003	218.9253
Total		218.4782	5.1600e-003	1.0700e-003	218.9253

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Unenclosed Parking with Elevator	392268	218.4782	5.1600e-003	1.0700e-003	218.9253
Total		218.4782	5.1600e-003	1.0700e-003	218.9253

6.0 Area Detail

6.1 Mitigation Measures Area

AAA Parking Structure - South Coast AQMD Air District, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199
Unmitigated	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199

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	2.8100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0131					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.0000e-004	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199
Total	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199

AAA Parking Structure - South Coast AQMD Air District, Annual

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.8100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0131					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	9.0000e-004	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199
Total	0.0168	9.0000e-005	9.6100e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0186	0.0186	5.0000e-005	0.0000	0.0199

7.0 Water Detail

7.1 Mitigation Measures Water

AAA Parking Structure - South Coast AQMD Air District, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

AAA Parking Structure - South Coast AQMD Air District, Annual

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

AAA Parking Structure - South Coast AQMD Air District, Annual

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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AAA Parking Structure - South Coast AQMD Air District, Annual

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

APPENDIX E: ENVIRONMENTAL SITE ASSESSMENT



LOS ANGELES - TULSA - CLEVELAND
19528 VENTURA BOULEVARD, # 268, LOS ANGELES, CALIFORNIA 91356
V/F (800) 704-4193 WWW.PRIORITY1ENVIRONMENTAL.COM

JANUARY 14, 2020
PROJECT # P1E 2019-12-08

SUBJECT SITE
640-700 WEST 27TH STREET,
LOS ANGELES, CA 90007
APN: 5123015006, 5123015007, 5123015008,
5123015009, 5123016001, 5123016002

PHASE 1 ENVIRONMENTAL SITE ASSESSMENT REPORT

PREPARED FOR:
AAA CLUB ENTERPRISES PROCURMENT SERVICES
3333 FAIRVIEW ROAD,
COSTA MESA, CA 92626

EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment has been conducted for the subject property, the Opinion, Conclusions and Recommendations are provided below.

Findings

- 1) **Site Legal Description:** The subject property consists of six parcels, located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002.
- 2) **Site History:** Prior to 1969, the subject property was used as residential single-family and multi-family dwellings. In 1969, the structures were demolished, and the subject property was developed into the existing asphalt parking lot.
- 3) **Site Observation:** The subject property is currently an asphalt parking lot used by the adjacent AAA Automobile Club of Southern California headquarters. No significant staining was observed throughout the subject property.
- 4) **Local Records Review:** No records were found for the subject property with the City of Los Angeles Fire Department Underground Storage Tank Division and Hazardous Material Division.
- 5) **EDR Findings for Subject Site:** The subject property was listed in Environmental Records Sources searched under the CERS, FINDS, and EMI databases.
- 6) **EDR Radius Report Findings:**

EDR reports 1 RESPONSE site within the searched parameters of the subject property.

EDR reports 12 ENVIROSTOR sites within the searched parameters of the subject property.

EDR reports 2 LUST sites within the searched parameters of the subject property.

EDR reports 10 UST sites within the searched parameters of the subject property.

EDR reports 1 AST site within the searched parameters of the subject property.

EDR reports 4 CERS HAZ WASTE sites within the searched parameters of the subject property.

EDR reports 5 SWEEPS UST sites within the searched parameters of the subject property.

EDR reports 3 HIST UST sites within the searched parameters of the subject property.

EDR reports 2 CERS TANK sites within the searched parameters of the subject property.

EDR reports 3 CA FID UST sites within the searched parameters of the subject property.

EDR reports 14 RCRA-NonGen sites within the searched parameters of the subject property.

EDR reports 1 FINDS site within the searched parameters of the subject property.

EDR reports 4 DRYCLEANERS sites within the searched parameters of the subject property.

EDR reports 1 EMI site within the searched parameters of the subject property.

EDR reports 1 CERS site within the searched parameters of the subject property.

EDR reports 8 EDR Hist Auto sites within the searched parameters of the subject property.

The Orphan Site List was Review. One (1) Orphan Site was reviewed. The site was not within the searched radius of the subject property.

Opinions

- 7) **Recognized Environmental Conditions:** No recognized environmental conditions were identified during the visual site reconnaissance or in records reviewed.

- 8) **EDR Database Report Review:** The subject property was listed in the Radius Report; however, the listing is likely an error as no address was listed and the listing is for 1987, which the property was already redeveloped into the existing asphalt parking lot with no structures. The cases for the surrounding properties listed in the EDR database report are not anticipated to impact the subject property at this time, based on the type of listings, distance to the subject site, and additional information located in Geotracker and EnviroStor databases.

Conclusions

- 9) We have performed a Phase 1 Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 for the subject property, which consists of six parcels, located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002. The subject property was listed in the Environmental Records Sources searched under the CERS, FINDS, and EMI databases. Any exceptions to, or deletions from, this practice are described in the Limitations Section of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property.

Recommendations

Additional Environmental Investigations are not recommended at this time.

PHASE 1 ENVIRONMENTAL SITE ASSESSMENT REPORT
640-700 WEST 27TH STREET, LOS ANGELES, CA 90007

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AAA Club Enterprises Procurement Services
3333 Fairview Road,
Costa Mesa, CA 92626
Attn: Jazmin Ocegueda

Subject: Phase 1 Environmental Site Assessment for
640-700 West 27th Street,
Los Angeles, CA 90007
APN: 5123015006, 5123015007, 5123015008,
5123015009, 5123016001, and 5123016002

As requested by AAA Club Enterprises Procurement Services, we have prepared an Environmental Site Assessment (Phase 1) for the property located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002. This report was produced in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessments Process (ASTM 1527-13) and is in general compliance with the All Appropriate Inquiries (AAI) rule.

1.0 INTRODUCTION

1.1 Location and Legal Description

The subject property consists of six parcels, located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002. A site vicinity map and a generalized location map are located on in Appendix 9.2.

1.2 Site and Vicinity General Characteristics

The subject property is located in the City of Los Angeles, approximately one mile southwest of Downtown Los Angeles. The site is located ½ miles southwest of the 10 and 110 freeway interchange located along the southwest side of southeast trending West 27th Street. The surrounding properties consist of commercial offices and university apartment buildings.

1.3 Description of Improvements on Property

The subject property consists of an approximately 1.59-acres of asphalt parking lot used for the AAA offices located across West 27th Street.

1.4 Current Uses of Adjoining Properties

Direction	Type of Use
Northeast	2601 South Figueroa Street – AAA Los Angeles Headquarters.
Northwest	710 West 27 th Street – Apartment building.
Southeast	634 West 27 th Street – Apartment building (USC).
Southwest	639-707 West 28 th Street – Clubs, Lodges, Professional Associations.

1.5 Purpose

The purpose of this Phase 1 Environmental Site Assessment is to identify to the extent feasible recognized environmental conditions (REC) in connection with the property. Following the processes prescribed by the AAI rule and in ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment process.

- ❖ As defined by ASTM E1527-13, §1.1.1, the term "recognized environmental conditions" is defined as follows: *"The presence or likely presence of any hazardous substance or petroleum products in, on or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions."*
- ❖ As defined by ASTM E1527-13, §3.2.18, the term "controlled recognized environmental condition" is defined as follows: *"A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."*
- ❖ As defined by ASTM E1527-13, §3.2.42, the term "historical recognized environmental condition" is defined as follows: *"A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."*

1.6 Detailed Scope-of-Work

The scope of work performed for this Phase 1 Environmental report includes:

- Collecting and reviewing available environmental related information concerning the property and other data pertinent to the specific site per the ASTM standard 1527;
- Conducting a site visit to observe current site uses, observe adjacent land use, and gather data on possible spills, or misuse of chemicals that could be considered a REC;
- Contacting appropriate regulatory personnel and reviewing regulatory files regarding the property in question.

No additional non-scope considerations per Section 13 of ASTM 1527-13 were included in this Phase 1 Report including sections 13.1.5.1 to 13.1.5.14.

1.7 Significant Assumptions

No Significant assumptions were made in this assessment.

1.8 Limitations and Exceptions

Limitations

This report is applicable only for the project and site studied. Report findings and statements of professional opinion do not constitute a guarantee or warranty, expressed or implied. This report contains information and data provided by others and Priority One Environmental, Inc. in no way warrants the accuracy or completeness of the information provided by those sources. Our services are performed in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions. This report is prepared using the ASTM Standard E1527-13 and includes several inherent limitations, including but not limited to: Section 4.5.1 - Uncertainty Not Eliminated, Section 4.5.2 - Not Exhaustive, Section 7.4 - No Sampling, and Section 7.5.2.1 - Reliance.

Exceptions

No exceptions to or deviations from the ASTM standard 1527-13 were made during the course of our work except for the following:

- *No Interviews were conducted with local agencies as part of this assessment. Relevant local agencies for the area have policies of referring requests for interviews to their file review departments.*

These limitations are not anticipated to represent a significant data gap for the investigation.

1.9 Special Terms and Conditions

We have been authorized by **AAA Club Enterprises Procurement Services** to perform a Phase 1 environmental site assessment of the subject property. It is our understanding that **AAA Club Enterprises Procurement Services** will use the information contained in the report for due diligence and innocent landowner's protection under CERCLA. Without prior written consent of the client, Priority One Environmental, Inc. will keep confidential and not disclose to any person or entity, and data or information provided by the client or generated in conjunction with the performance of this study, except when required by law. Provisions of confidentiality shall not apply to data or information obtained from the public domain or acquired from third parties not under obligation to the client to maintain confidentiality.

1.10 User Reliance

This report was prepared for the exclusive use of **AAA Club Enterprises Procurement Services**. No other person or entity is entitled to rely upon this report without the specific written authorization of Priority One Environmental, Inc. Such reliance is a subject to the same limitations, terms, and conditions as the original contract with the client. Priority One Environmental, Inc. specifically disclaims any responsibility for any unauthorized use of this report. Based on the ASTM standard this Phase 1 report is reliable for 180 days from the date the work was conducted.

2.0 USER PROVIDED INFORMATION

2.1 Title Records

A Preliminary Title Report was not provided for review.

2.2 Environmental Liens or Activity and Use Limitations

No Additional information was provided identifying actual knowledge of environmental liens or activity and use limitations recorded against the subject property. The California State Department of Toxic Substances website EnviroStor was searched and no environmental liens placed by the State environmental agency for the subject site was found.

2.3 Specialized Knowledge

No information was provided identifying specialized knowledge or experience that is material to recognized environmental conditions in connection with the subject property.

2.4 Commonly Known or Reasonably Ascertainable Information

No information was provided identifying knowledge of commonly known or reasonably ascertainable information related to the subject property.

2.5 Valuation Reduction for Environmental Issues

No Information was provided identifying knowledge of valuation reduction of the subject property.

2.6 Owner, Property Manager, and Occupant Information

Information provided by the owner of the subject property is discussed in Section 5.0 of this report.

2.7 Reason for Performing Phase 1

The Phase 1 has been requested by the client for the use in the redevelopment of the property.

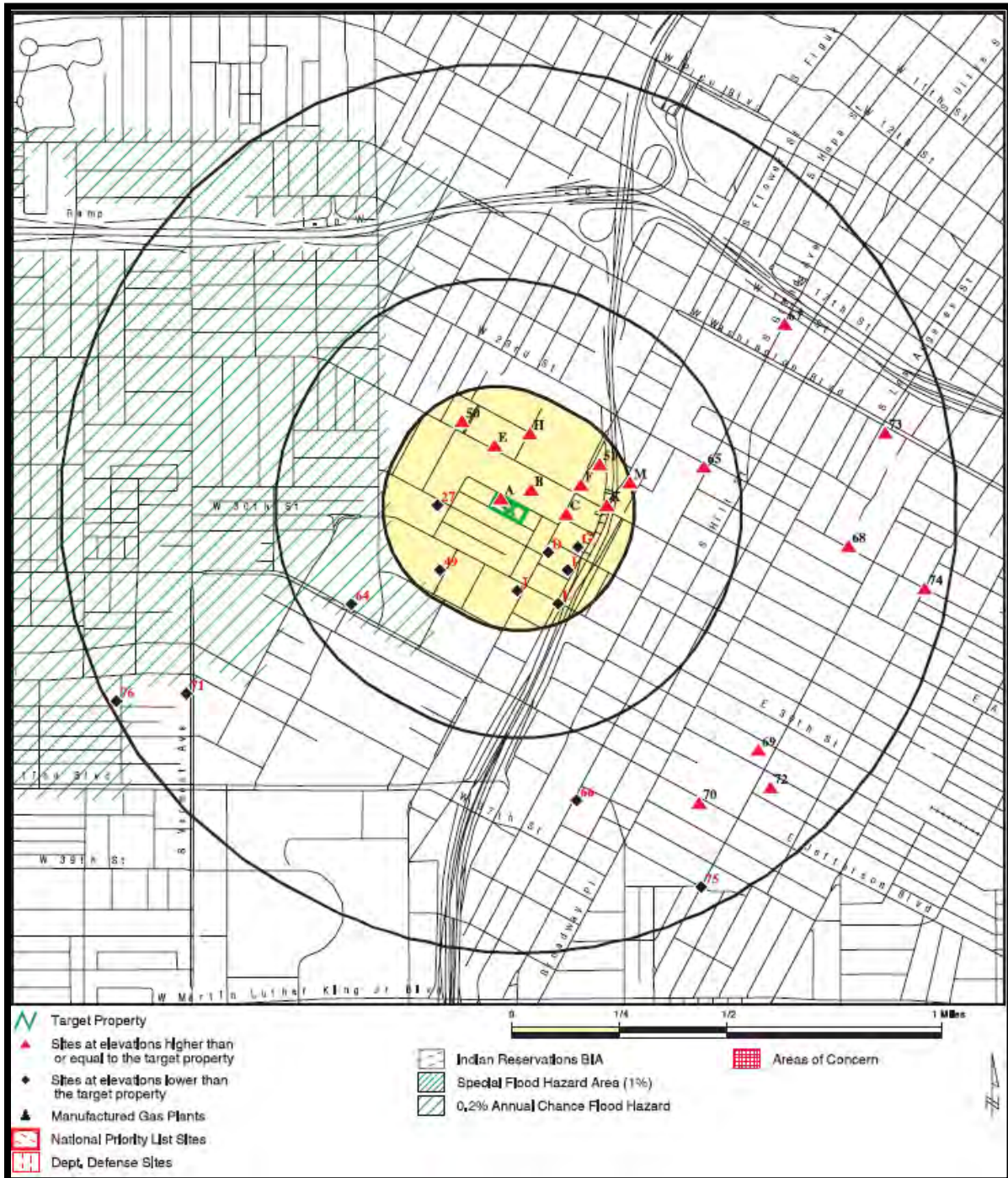
2.8 Other

No other information was provided for review related to the subject property.

3.0 RECORDS REVIEW

3.1 EDR Map Findings

The subject property is located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002. The subject property was listed in the Environmental Records searched under the CERS, FINDS, and EMI databases.



Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
<i>Federal NPL site list</i>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	1.000		0	0	0	0	NR	0
<i>Federal Delisted NPL site list</i>								
Delisted NPL	1.000		0	0	0	0	NR	0
<i>Federal CERCLIS list</i>								
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
SEMS	0.500		0	0	0	NR	NR	0
<i>Federal CERCLIS NFRAP site list</i>								
SEMS-ARCHIVE	0.500		0	0	0	NR	NR	0
<i>Federal RCRA CORRACTS facilities list</i>								
CORRACTS	1.000		0	0	0	0	NR	0
<i>Federal RCRA non-CORRACTS TSD facilities list</i>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<i>Federal RCRA generators list</i>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		2	3	NR	NR	NR	5
RCRA-VSQG	0.250		0	0	NR	NR	NR	0
<i>Federal institutional controls / engineering controls registries</i>								
LUCIS	0.500		0	0	0	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
<i>Federal ERNS list</i>								
ERNS	0.001		0	NR	NR	NR	NR	0
<i>State- and tribal - equivalent NPL</i>								
RESPONSE	1.000		0	0	0	1	NR	1
<i>State- and tribal - equivalent CERCLIS</i>								
ENVIROSTOR	1.000		0	0	1	11	NR	12
<i>State and tribal landfill and/or solid waste disposal site lists</i>								
SWF/LF	0.500		0	0	0	NR	NR	0
<i>State and tribal leaking storage tank lists</i>								
LUST	0.500		1	0	1	NR	NR	2

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
INDIAN LUST	0.500		0	0	0	NR	NR	0
CPS-SLIC	0.500		0	0	0	NR	NR	0
<i>State and tribal registered storage tank lists</i>								
FEMA UST	0.250		0	0	NR	NR	NR	0
UST	0.250		4	6	NR	NR	NR	10
AST	0.250		0	1	NR	NR	NR	1
INDIAN UST	0.250		0	0	NR	NR	NR	0
<i>State and tribal voluntary cleanup sites</i>								
INDIAN VCP	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
<i>State and tribal Brownfields sites</i>								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
<u>ADDITIONAL ENVIRONMENTAL RECORDS</u>								
<i>Local Brownfield lists</i>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<i>Local Lists of Landfill / Solid Waste Disposal Sites</i>								
WMUDS/SWAT	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
HAULERS	0.001		0	NR	NR	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
IHS OPEN DUMPS	0.500		0	0	0	NR	NR	0
<i>Local Lists of Hazardous waste / Contaminated Sites</i>								
US HIST CDL	0.001		0	NR	NR	NR	NR	0
AOCONCERN	1.000		0	0	0	0	NR	0
HIST Cal-Sites	1.000		0	0	0	0	NR	0
SCH	0.250		0	0	NR	NR	NR	0
CDL	0.001		0	NR	NR	NR	NR	0
CERS HAZ WASTE	0.250		1	3	NR	NR	NR	4
Toxic Pits	1.000		0	0	0	0	NR	0
US CDL	0.001		0	NR	NR	NR	NR	0
PFAS	0.500		0	0	0	NR	NR	0
<i>Local Lists of Registered Storage Tanks</i>								
SWEEPS UST	0.250		3	2	NR	NR	NR	5
HIST UST	0.250		2	1	NR	NR	NR	3
CERS TANKS	0.250		2	0	NR	NR	NR	2
CA FID UST	0.250		1	2	NR	NR	NR	3
<i>Local Land Records</i>								
LIENS	0.001		0	NR	NR	NR	NR	0

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
LIENS 2	0.001		0	NR	NR	NR	NR	0
DEED	0.500		0	0	0	NR	NR	0
<i>Records of Emergency Release Reports</i>								
HMIRS	0.001		0	NR	NR	NR	NR	0
CHMIRS	0.001		0	NR	NR	NR	NR	0
LDS	0.001		0	NR	NR	NR	NR	0
MCS	0.001		0	NR	NR	NR	NR	0
SPILLS 90	0.001		0	NR	NR	NR	NR	0
<i>Other Ascertainable Records</i>								
RCRA NonGen / NLR	0.250		4	10	NR	NR	NR	14
FUDS	1.000		0	0	0	0	NR	0
DOD	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
US FIN ASSUR	0.001		0	NR	NR	NR	NR	0
EPA WATCH LIST	0.001		0	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
TSCA	0.001		0	NR	NR	NR	NR	0
TRIS	0.001		0	NR	NR	NR	NR	0
SSTS	0.001		0	NR	NR	NR	NR	0
ROD	1.000		0	0	0	0	NR	0
RMP	0.001		0	NR	NR	NR	NR	0
RAATS	0.001		0	NR	NR	NR	NR	0
PRP	0.001		0	NR	NR	NR	NR	0
PADS	0.001		0	NR	NR	NR	NR	0
ICIS	0.001		0	NR	NR	NR	NR	0
FTTS	0.001		0	NR	NR	NR	NR	0
MLTS	0.001		0	NR	NR	NR	NR	0
COAL ASH DOE	0.001		0	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
PCB TRANSFORMER	0.001		0	NR	NR	NR	NR	0
RADINFO	0.001		0	NR	NR	NR	NR	0
HIST FTTS	0.001		0	NR	NR	NR	NR	0
DOT OPS	0.001		0	NR	NR	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
FUSRAP	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	0.001		0	NR	NR	NR	NR	0
US AIRS	0.001		0	NR	NR	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
ABANDONED MINES	0.250		0	0	NR	NR	NR	0
FINDS	0.001		1	NR	NR	NR	NR	1
ECHO	0.001		0	NR	NR	NR	NR	0
UXO	1.000		0	0	0	0	NR	0
DOCKET HWC	0.001		0	NR	NR	NR	NR	0
FUELS PROGRAM	0.250		0	0	NR	NR	NR	0
CA BOND EXP. PLAN	1.000		0	0	0	0	NR	0
Cortese	0.500		0	0	0	NR	NR	0
CUPA Listings	0.250		0	0	NR	NR	NR	0

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
DRYCLEANERS	0.250		0	4	NR	NR	NR	4
EMI	0.001		1	NR	NR	NR	NR	1
ENF	0.001		0	NR	NR	NR	NR	0
Financial Assurance	0.001		0	NR	NR	NR	NR	0
HAZNET	0.001		0	NR	NR	NR	NR	0
ICE	0.001		0	NR	NR	NR	NR	0
HIST CORTESE	0.500		0	0	0	NR	NR	0
LOS ANGELES CO. HMS	0.001		0	NR	NR	NR	NR	0
HWP	1.000		0	0	0	0	NR	0
HWT	0.250		0	0	NR	NR	NR	0
MINES	0.250		0	0	NR	NR	NR	0
MWMP	0.250		0	0	NR	NR	NR	0
NPDES	0.001		0	NR	NR	NR	NR	0
PEST LIC	0.001		0	NR	NR	NR	NR	0
PROC	0.500		0	0	0	NR	NR	0
Notify 65	1.000		0	0	0	0	NR	0
LA Co. Site Mitigation	0.001		0	NR	NR	NR	NR	0
UIC	0.001		0	NR	NR	NR	NR	0
UIC GEO	0.001		0	NR	NR	NR	NR	0
WASTEWATER PITS	0.500		0	0	0	NR	NR	0
WDS	0.001		0	NR	NR	NR	NR	0
WIP	0.250		0	0	NR	NR	NR	0
MILITARY PRIV SITES	0.001		0	NR	NR	NR	NR	0
PROJECT	0.001		0	NR	NR	NR	NR	0
WDR	0.001		0	NR	NR	NR	NR	0
CIWQS	0.001		0	NR	NR	NR	NR	0
CERS	0.001		1	NR	NR	NR	NR	1
NON-CASE INFO	0.001		0	NR	NR	NR	NR	0
OTHER OIL GAS	0.001		0	NR	NR	NR	NR	0
PROD WATER PONDS	0.001		0	NR	NR	NR	NR	0
SAMPLING POINT	0.001		0	NR	NR	NR	NR	0
WELL STIM PROJ	0.001		0	NR	NR	NR	NR	0
LOS ANGELES CO LF METHANE	0.001		0	0	0	NR	NR	0
MINES MRDS	0.001		0	NR	NR	NR	NR	0
<u>EDR HIGH RISK HISTORICAL RECORDS</u>								
<i>EDR Exclusive Records</i>								
EDR MGP	1.000		0	0	0	0	NR	0
EDR Hist Auto	0.125		8	NR	NR	NR	NR	8
EDR Hist Cleaner	0.125		0	NR	NR	NR	NR	0
<u>EDR RECOVERED GOVERNMENT ARCHIVES</u>								
<i>Exclusive Recovered Govt. Archives</i>								
RGA LF	0.001		0	NR	NR	NR	NR	0
RGA LUST	0.001		0	NR	NR	NR	NR	0
- Totals -		0	31	32	2	12	0	77

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

For the full name, description, and the date each of the databases were last updated, please refer to the Government Record section of the EDR® Report.

3.2 Subject Property

EDR Reports the site was listed in the CERS, FINDS, and EMI databases.

The site is listed as University of So Cal Physical Plant.

The CERS ID is 110013999600, Description: US EPA Air Emission Inventory System (EIS).

The EMI database lists the site in 1987 with an emission of total organic hydrocarbon gasses (1 ton/year). Carbon Monoxide Emissions 4 tons/year, NOX Oxides of Nitrogen 4 tons/year, Sox Oxides of Sulphur 14 tons/year, Particulate matter 1 ton/year, part. Matter 10 micrometers and smaller 1 ton/year.

This listing is likely an error as, the subject property has been a asphalt parking lot since 1969.

3.3 Surrounding Properties

76 sites were listed in the EDR Radius Report, these sites were reviewed. The adjacent property to the northeast, a active gasoline station to the east and two historical sites to the east-northeast are discussed below:

Site Name(s)	Address	Distance	Databases
Automobile Club of So Cal	2601 South Figueroa Street	245' NNE	HAZNET, EMI, UST, SWEEPS UST, HIST UST, FINDS, ECHO, RCRA NonGen/ NLR, RCRA-SQG, CERS TANKS, and CERS
<p>Los Angeles UST and Los Angeles HM reports the status as active. The HIST UST database reports 3 10,000-gallon tanks installed in 1976 containing waste oil and regular motor vehicle fuel. The SWEEPS UST database reports 2 10,000-gallon tanks used for Motor vehicle fuel and 1 8,000-gallon tank used for motor vehicle fuel.</p> <p>RCRA NonGen/NLR and RCRA-SQG databases reports no violations found.</p> <p>Since 1985, approximately 1,360 tons of asbestos containing material has been disposed of off-site to a landfill. The site has stored and disposed of off-site waste oil, solvents, and PCBs containing material since 1985.</p>			

Site Name(s)	Address	Distance	Databases
Mobile Oil Crop, @18-BV7 Circle K Stores Inc, #2709 Exxon Mobile Corp	2620 South Figueroa Street	484' E	UST, CERS HAZ WASTE, SWEEPS UST, CERS TANKS, CA FID UST, HAZMAT, CERS, RCRA NonGen/ NLR, EDR Hist Auto, and LUST
<p>The status of the LUST case is completed – case closed as of September 19, 2006. The potential media affected was soil and the potential containments of concern was gasoline. The case began in June 2000 with site assessments in 2000, 2003 and 2004. The site is currently an active gasoline service station.</p>			

Site Name(s)	Address	Distance	Databases
Hodges Robert L	2598 S Figueroa St	646' East	EDR HIST Auto, UST
The site is listed as a gasoline service station from 1969 to 1977 and is listed as Historical under the Los Angeles UST database.			

Site Name(s)	Address	Distance	Databases
Mom's Cleaners	2520 South Figueroa Street	728' ENE	CERS HAZ WASTE, DRYCLEANERS, EMI, HAZMAT, CERS, EDR Hist Cleaner.
The site is listed as a drycleaner from 1993 to 2014. The site is listed as inactive.			

The remaining cases listed in the EDR Database Report were for regulatory database listings, permitted facilities listings, closed/remediated cases, and historical database listings; including sites which, based on indicated groundwater directional flow and their distances, are not anticipated to impact the Subject Property.

3.4 Orphan Properties

One (1) Orphan Site was reviewed. The site was not within the searched radius of the subject property.

3.5 Physical Setting Sources

According to the most recent USGS Topographic map covering to subject property and vicinity, the subject property is relatively level and lies at approximately 203 feet above sea-level. The regional topography slopes to the southwest.

According to EDR GEOCHECK the site is mapped as a Loam soils with a Hydrologic Group Classification of Class Urban Land. Urban Land is defined as soils with variable infiltration rates with an unreported soil drainage class. The corrosion potential versus uncoated steel for the soil is unreported.

GEOTRACKER: Groundwater monitoring wells located for case # 900070070, located at 1403 Adams Boulevard, Los Angeles, CA which is approximately ½ miles to the west-northwest list's groundwater at a depth of 109-110 feet below ground surface.

3.6 Sanborn Insurance Maps

An attempt was made by EDR to obtain Sanborn Insurance Company maps for the period covering the years 1860 through the present in order to determine what types of activities were conducted on the subject property and on adjoining properties. 16 Sanborn Maps were found for years 1894, 1900, 1907, 1922, 1950, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1966, 1968, 1969, and 1970. The maps are discussed below:

1894 SANBORN MAP	
<u>Subject Property</u>	Not Mapped.
<u>Northeast</u>	Orchards and dwellings.
<u>Southeast</u>	Vacant parcels.
<u>Northwest</u>	Not mapped.
<u>Southwest</u>	Not mapped.

1900 SANBORN MAP	
<u>Subject Property</u>	Vacant parcels.
<u>Northeast</u>	Three dwellings with additional structures.
<u>Southeast</u>	Not mapped.
<u>Northwest</u>	Not mapped.
<u>Southwest</u>	Vacant parcels.

1907 SANBORN MAP	
<u>Subject Property</u>	1 dwelling near center of property along West 27 th Street with detached structure along alleyway.
<u>Northeast</u>	Dwellings.
<u>Southeast</u>	Vacant parcel.
<u>Northwest</u>	Dwellings.
<u>Southwest</u>	Dwellings.

1922 SANBORN MAP	
<u>Subject Property</u>	Dwellings on 650, 658 and 700 West 27 th Street.
<u>Northeast</u>	Dwellings.
<u>Southeast</u>	Vacant parcel.
<u>Northwest</u>	Dwelling.
<u>Southwest</u>	Dwellings

1950/1954 SANBORN MAP	
<u>Subject Property</u>	640 consists of 10 apartments with detached garage along alleyway. 650 consists of a dwelling with detached garage. 658 consists of three dwellings and detached garage. 676 consists of 22 apartments with three detached garages. 700 consists of two dwellings along northeast portions with apartments along southwest portion.
<u>Northeast</u>	The Auto Club structure has expanded along the northeast property line. An addition to the south side of the garage structure has been added and is listed as auto repair/auto storage/sign painting. A car shop, paint shop is listed in the building.
<u>Southeast</u>	Apartment building and dwelling.
<u>Northwest</u>	Dwelling.
<u>Southwest</u>	Sorority Houses, Frat house and Dwelling.

1957/1958 SANBORN MAP	
<u>Subject Property</u>	640 consists of 10 apartments with detached garage along alleyway. 650 consists of a dwelling with detached garage. 658 consists of three dwellings and detached garage. 676 consists of 22 apartments with three detached garages. 700 consists of two dwellings along northeast portions with apartments along southwest portion.
<u>Northeast</u>	The Auto Club property.
<u>Southeast</u>	Apartment building and dwelling.
<u>Northwest</u>	Dwelling.
<u>Southwest</u>	Sorority Houses, Frat house and Dwelling.

1959/1960 SANBORN MAP	
<u>Subject Property</u>	640 consists of 10 apartments with detached garage along alleyway. 650 consists of a dwelling with detached garage. 658 consists of three dwellings and detached garage. 676 consists of 22 apartments with three detached garages. 700 consists of two dwellings along northeast portions with apartments along southwest portion.
<u>Northeast</u>	The Auto Club property.
<u>Southeast</u>	Apartment building and dwelling.
<u>Northwest</u>	Apartment building.
<u>Southwest</u>	Sorority Houses, Frat house and Dwelling.

1966/1968/1969 SANBORN MAP	
<u>Subject Property</u>	640 consists of 10 apartments with detached garage along alleyway. 650 consists of a dwelling with detached garage. 658 consists of three dwellings and detached garage. 676 consists of 22 apartments with three detached garages. 700 consists of two dwellings along northeast portions with apartments along southwest portion.
<u>Northeast</u>	The Auto Club property.
<u>Southeast</u>	Apartment building.
<u>Northwest</u>	Apartment building.
<u>Southwest</u>	Sorority Houses, Frat house and Dwelling.

1970 SANBORN MAP	
<u>Subject Property</u>	Asphalt parking lot.
<u>Northeast</u>	The Auto Club property.
<u>Southeast</u>	Apartment building.
<u>Northwest</u>	Apartment building.
<u>Southwest</u>	Sorority Houses, Frat house and Dwelling.

3.7 Historical Aerial Photographs

Aerial photographs of the subject property provided by EDR were reviewed as part of this investigation.

Subject Property	Year(s)	Description
	1923	The subject property consists of residential dwellings and vacant lot.
	1928	By 1928, the apartment dwellings located on the northwest and southeast portions of the property are existing.
	1938-1964	The property consists of residential dwellings and multi-family dwellings.
	1970	The property has been redeveloped into an asphalt parking lot.
	1977-2016	The property is an asphalt parking lot.

Property to Northeast	Year	Description
	1923	The properties to the northeast consist of residential properties and vacant land. The AAA building to the east-northeast is existing.
	1928	Similar as in 1923.
	1938	The AAA building to the northeast has expanded to the northwest.
	1948	By 1948, the property to the northeast appears to be a parking lot.
	1952-1964	Similar to 1948.
	1970	By 1970, a structure has been added to the northwest of the existing AAA structures.
	1977	The asphalt parking lot for the AAA structures has expanded to the northwest.
	1983-2016	The AAA buildings and parking lots to the northeast appear similar from 1983 to 2016.

Property to Northwest	Year	Description
	1923	The property to the northwest is an existing residence.
	1928-1952	From 1928 to 1952, the property to the northwest is residential dwelling with detached garage.
	1964	By 1964, the property to the northwest has been redeveloped into an apartment building.
	1970-2016	The apartment building appears similar from 1970 to 2016.

Property to	Year	Description
Southeast	1923	The property to the southeast is vacant lot.
	1928	A pair of structures are existing on the property to the southeast.
	1938-1952	Similar to 1928.
	1964	By 1964, the property has been redeveloped into a multi-family apartment building.
	1970-2016	The apartment building to the southeast appears similar from 1970 to 2016.

Property to	Year	Description
Southwest	1923-1948	The properties to the southwest are residential single-family dwellings.
	1952-1977	From 1952 to 1977, the dwellings have been redeveloped into apartment buildings.
	1983-2016	The properties to the southwest are apartment buildings.

These photos are included in the Appendix.

3.8 Historical Topographic Maps

Topographic maps of the subject property provided by EDR were reviewed as part of this investigation.

YEAR(S)	DESCRIPTION.
1894, 1896, 1898, 1900, 1902	The subject street and adjoining streets are existing. Several structures are mapped in the vicinity of the subject property. The topography trends to the southwest.
1920, 1921	Similar to previous maps. No structures are mapped on the subject property.
1928	The Auto club building is mapped on the southeast portion of the property. Several structures are mapped on the property. The elevation is mapped as 200' just north of the property and the topography trends to the southwest.
1953	Appears similar to previous date.
1966	Mt St. Mary's college is existing to the north.
1972, 1981, 1991	The addition along the northeast property line west of the existing Auto Club building is mapped.
2012	Current Topographic Map.

These maps are included in the Appendix.

3.9 City Directories

A search of local historical city directories was conducted by EDR for the subject property. The review included directories in five-year intervals from 1920 to 2014 (as available).

The subject properties addresses are listed for dated 1958 and 1967 under individual names. No additional records were identified for the subject property based on the address provided. The surrounding properties are listed in detail in the attached Directory Search.

3.10 Building Records

The building permits lists that dwellings were demolished in 1969 for the redevelopment of the property into a parking lot.

Based on the aerial photos, topographic maps of the site and the assessor records, the properties were originally developed into dwellings and multi-family dwellings between 1907 and 1950. The subject properties' building were demolished circa 1969.

4.0 SUBJECT PROPERTY RECONNAISSANCE

A visual reconnaissance of the subject property was conducted on Wednesday, January 8, 2020 by Mr. Paul Robinson. Photographs of the subject property are attached to this report in Appendix.

4.1 Methodology and Limiting Conditions

The periphery of the subject property was inspected. A detailed inspection was conducted of all major site features visible from the public portions of the property.

4.2 Subject Property Reconnaissance

Observations made during the site visit are summarized in the following table:

SITE VISIT OBSERVATIONS	
Current Use of Property	Asphalt Parking lot.
Evidence of Past Uses of Property?	No past use is identifiable.
Potable Water Source	N/A.
Sewage Disposal Source	N/A.
Topography of property and vicinity	Relatively level
Current use of adjoining properties	NORTHWEST: Apartment building. NORTHEAST: AAA Headquarters. SOUTHWEST: Apartment buildings. SOUTHEAST: Apartment building.
Past Uses of Surrounding Properties?	No past use is identifiable.

Observation Check List			
Type	Observed	Not Observed	Notes
Odors		X	
Transformers (Pole/Pad Mounted)	X		Across alleyway – good condition.
USTs		X	
ASTs		X	
Fuel Island		X	
In-ground Hydraulic Hoist		X	
Hazardous Waste Storage		X	
Hazardous Waste Treatment		X	
Hazardous Waste Disposal		X	
Major Spills		X	
Major Leaks		X	
Significant Staining		X	
Distressed Vegetation		X	
Stocked Piled Soils		X	
Waste treatment Unit/Clarifier		X	
Solid Waste Disposal		X	
Wells		X	
Underground Pipelines		X	
Pits, Ponds, and/or Lagoons		X	
Herbicide and/or Pesticide		X	

4.3 Detailed Observations

Odors - Indoor and Visible Emissions

No unusual smells, obnoxious odors, or visual emissions were observed during the inspection of the subject property.

Polychlorinated Biphenyl (PCB's)

PCB manufacturing in the United States was discontinued in 1978. Pole-mounted transformers were found in the vicinity of the subject site building, appearing in good condition without any sign of leakage.

Pools of Liquid of Chemicals

No pools or excessive ponding of liquid or chemicals were observed during the visual site inspection.

Underground Storage Tank (UST)

The visual inspection of the subject site revealed no evidence of surface or above ground (e.g., fill pipe, vent pipes, fill connections, concrete pads, saw cuts, sumps, spill containment device, leak detection device, etc.) features normally associated with underground storage tanks (UST's).

Aboveground Storage Tank

The visual inspection of the subject site revealed no evidence of surface or above ground (e.g., fill pipe, vent pipes, fill connections, concrete pads, saw cuts, concrete pad, drains in vicinity, etc.) features normally associated with aboveground storage tanks (AST's). Visual observation also includes the inspection to identify any surface markings indicating the existence of aboveground product pipelines. No evidence for the presence of on-site aboveground storage tank was identified.

Fuel Islands

The visual inspection of the subject site revealed no evidence of fuel islands or dispensers either in operation or abandoned.

Hydraulic Hoist Unit

The visual inspection of the subject site revealed no presence of underground hydraulic hoist units within the subject site premise.

Hazardous Materials/Petroleum Products Storage & Handling

During the visual site inspection, no containers storing automotive or industrial batteries, pesticides, paints or chemicals, seemingly exhibiting toxic hazards were observed.

Other Containers

No other containers indicating any sign of environmental concern were observed during the site inspection.

Hazardous Waste Treatment, Storage, Disposal (TSD)

No storage, treatment, or disposal of hazardous waste was found during the visual site inspection.

Major Spills, Leaks or Staining

No major spills, leakage, or staining were observed throughout the overall grounds.

Distress Vegetation

Planters and vegetation in the vicinity of and within the subject site were found well maintained on bare soil or within separate planters in relatively good appearance with no sign of chemical stress or unnatural appearance.

Stockpiled Soils

The site inspection did not reveal any evidence of stockpiled soils on the ground of subject property.

Wastewater Treatment Unit/Clarifier

No underground industrial wastewater treatment facility, i.e., clarifier was observed on the subject property during the site visit.

Stormwater

Storm water drainage system in the close proximity of the subject area did not identify any abnormal accumulation of petroleum or chemical run-off or foreign materials.

Solid Waste Disposal

There were no observations of improper activities of treatment or disposal of hazardous, medical, or toxic wastes being performed at the subject site.

Wells

The site walk-through did not discover any irrigation wells, injection wells, abandoned wells, groundwater monitoring wells, dry wells, septic wells, oil wells, gas wells, domestic water wells, or other monitoring wells on the subject property premise.

Underground Pipelines

The visual site inspection did not reveal any evidence of underground pipelines beneath the ground of the subject property, other than public utility lines such as sewer, power, and electric lines, for which public "dig-alert" service would easily identify upon 48-hour telephone notice in advance.

Pits, Ponds, Lagoons

No visible evidence of wetlands, such as pits, ponds, lagoons, or any other water bodies, was observed within the subject property's boundary lines.

Herbicides/Pesticides

No evidence of herbicide or pesticide use on the subject property was observed during the visual site inspection.

5.0 INTERVIEWS

An attempt has been made to obtain historical as well as current information relative to the subject property from several individuals and local agencies. The objective of the interview process is to obtain any information indicating recognized environmental conditions in connection with the subject site.

5.1 Interview with Owner or Site Manager

An Environmental Questionnaire and Disclosure Statement were sent to Ms. Jazmin Ocegueda, on Monday, December 23, 2019. As of the date of this report, the questionnaire has not been returned.

5.2 Interview with Local Government Officials

Los Angeles City Fire - Hazardous Material Department

The City of Los Angeles now only accepts record requests if the site has a facility ID unless it is for a Historical Underground Storage Tank Listing. The City of Los Angeles Fire Department provides Listing Sheets for inactive, active and historical sites for review.

Underground Storage Tank Division Active and Inactive Underground Storage Tank Listing Sheets were reviewed for the subject address. The subject property addresses were not found.

The City of Los Angeles Fire Department Active and Inactive Hazardous Materials Site Listing Sheets were reviewed for the subject address. The subject property addresses were not found.

The City of Los Angeles Fire Department Active and Inactive Aboveground Storage Tank Facility Listing Sheets were reviewed for the subject address. The subject property addresses were not found.

The City of Los Angeles Fire Department Historical Underground Storage Tank Listing Sheets were reviewed for the subject address. The subject property addresses were not found.

South Coast Air Quality Management District

The South Coast Air Quality Management District FINDS database was reviewed for the subject property. The subject property was not found.

GEOTRACKER/ENVIROSTOR Database Review

The GEOTRACKER database and the ENVIROSTOR database were reviewed for any additional information available in regards to the subject property. No additional information was located for the subject property.

CalEPA Regulated Site Portal

The CalEPA Regulated Site Portal was reviewed for the subject property and adjacent properties. The subject property and adjacent property to the northeast were listed and are discussed below:

UNIV of SO CAL PHYSICAL PLANT – University Park – Los Angeles, CA 90007.

The site is listed under the US EPA Air Emission Inventory System (EIS). EIS maintains an inventory of large stationary sources and voluntarily reported smaller sources of air point pollution emitters.

Automobile Club of So California (Northeast)

The site is listed under address 2601 South Figueroa Street and listed under the Chemical Storage Facilities and Underground Storage Tank programs. 5 Evaluations with violations and 11 Evaluations without violations were listed. 2 open violations and 23 resolved violations were listed.

Open Violations:

OBSERVATION: Line leak detector failed to meet one or more of the following requirements: Monitor at least hourly; Capable of detecting a release of 3.0 gallons per hour at 10 p.s.i.g.; Restricting or shutting off the flow of product through the piping when a leak is detected. CORRECTIVE ACTION: Repair or replace line leak detector (specify tank) so that is it is capable of monitoring at least hourly, detecting a release of 3.0 gallons per hour at 10 p.s.i.g., and restricting or shutting off the flow of product through the piping when a leak is detected. *** Mr. Beach, please apply for a permit with the LAFD CUPA to install a line leak detector that will detect a 3 gallon per hour leak at 10 psi and either shut off the turbine or restrict the flow to the dispenser. ***

OBSERVATION: Owner/Operator did not install LLD on pressurized piping system. CORRECTIVE ACTION: Install and test LLD on pressurized piping system. Submit test results. *** Mr. Beach, please apply for a permit with the LAFD CUPA to install a line leak detector that will detect a 3 gallon per hour leak at 10 psi and either shut off the turbine or restrict the flow to the dispenser ***

Chemical Storage				
Name	Max Daily Amount	Average Daily Amount	Days Onsite	Physical state
Oxygen	0-2599 Cubic Feet	0-2599 Cubic Feet	0	Gas, Pure
Helium	0-2599 Cubic Feet	0-2599 Cubic Feet	0	Gas, Pure
Diesel Fuel #2	12,000-59,999-Gallons	12,000-59,999-Gallons	0	Liquid, Pure
Diesel Fuel #2	120-599-gallons	120-599-gallons	0	Liquid, Pure
Acetylene	0-2599 Cubic Feet	0-2599 Cubic Feet	0	Gas, Pure

Interview with Others

No additional interviews were conducted in this assessment.

6.0 EVALUATIONS

6.1 Findings

- 1) **Site Legal Description:** The subject property consists of six parcels, located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002.
- 2) **Site History:** Prior to 1969, the subject property was used as residential single-family and multi-family dwellings. In 1969, the structures were demolished, and the subject property was developed into the existing asphalt parking lot.
- 3) **Site Observation:** The subject property is currently an asphalt parking lot used by the adjacent AAA Automobile Club of Southern California headquarters. No significant staining was observed throughout the subject property.
- 4) **Local Records Review:** No records were found for the subject property with the City of Los Angeles Fire Department Underground Storage Tank Division and Hazardous Material Division.
- 5) **EDR Findings for Subject Site:** The subject property was listed in Environmental Records Sources searched under the CERS, FINDS, and EMI databases.
- 6) **EDR Radius Report Findings:**

EDR reports 1 RESPONSE site within the searched parameters of the subject property.

EDR reports 12 ENVIROSTOR sites within the searched parameters of the subject property.

EDR reports 2 LUST sites within the searched parameters of the subject property.

EDR reports 10 UST sites within the searched parameters of the subject property.

EDR reports 1 AST site within the searched parameters of the subject property.

EDR reports 4 CERS HAZ WASTE sites within the searched parameters of the subject property.

EDR reports 5 SWEEPS UST sites within the searched parameters of the subject property.

EDR reports 3 HIST UST sites within the searched parameters of the subject property.

EDR reports 2 CERS TANK sites within the searched parameters of the subject property.

EDR reports 3 CA FID UST sites within the searched parameters of the subject property.

EDR reports 14 RCRA-NonGen sites within the searched parameters of the subject property.

EDR reports 1 FINDS site within the searched parameters of the subject property.

EDR reports 4 DRYCLEANERS sites within the searched parameters of the subject property.

EDR reports 1 EMI site within the searched parameters of the subject property.

EDR reports 1 CERS site within the searched parameters of the subject property.

EDR reports 8 EDR Hist Auto sites within the searched parameters of the subject property.

The Orphan Site List was Review. One (1) Orphan Site was reviewed. The site was not within the searched radius of the subject property.

6.2 Opinions

- 7) **Recognized Environmental Conditions:** No recognized environmental conditions were identified during the visual site reconnaissance or in records reviewed.
- 8) **EDR Database Report Review:** The subject property was listed in the Radius Report; however, the listing is likely an error as no address was listed and the listing is for 1987, which the property was already redeveloped into the existing asphalt parking lot with no structures. The cases for the surrounding properties listed in the EDR database report are not anticipated to impact the subject property at this time, based on the type of listings, distance to the subject site, and additional information located in Geotracker and EnviroStor databases.

6.3 Conclusions

- 9) We have performed a Phase 1 Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 for the subject property, which consists of six parcels, located at 640-700 West 27th Street, Los Angeles, CA 90007. The property is identified by the Assessor's Parcel Numbers (APNs) 5123015006, 5123015007, 5123015008, 5123015009, 5123016001, and 5123016002. The subject property was listed in the Environmental Records Sources searched under the CERS, FINDS, and EMI databases. Any exceptions to, or deletions from, this practice are described in the Limitations Section of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property.

6.4 Recommendations

Additional Environmental Investigations are not recommended at this time.

6.5 References

- Environmental Data resources, Inc (EDR) Report
- ASTM Standard E1527-13 - Phase 1 Standard
- U.S. Geological Survey Topographic Maps
- State Water Resources Control Board, GEOTRACKER (geotracker.waterboards.ca.gov)
- Department of Toxic Substance Control, ENVIROSTOR (www.envirostor.dtsc.ca.gov)
- City of Los Angeles Department of Building and Safety Online Building Records (http://ladbsdoc.lacity.org/IDISPublic_Records/idis/DocumentSearchSelection.aspx)
- City of Los Angeles Fire Department UST, AST and HazMat Inventory Sheets.
- CalEPA Regulated Site Portal (<https://siteportal.calepa.ca.gov/nsite/>)

6.6 Professional Signature

According to Code of Federal Regulations CFR - Title 40 §312.10, Environmental Professional is defined as:

"(1) a person who possess sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see §312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f).

(2) Such a person must:

(i) hold a current professional engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years of full-time relevant experience; or

(ii) Be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in §312.21 and have the equivalent of three (3) years of full-time relevant experience; or

(iii) Have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or

(iv) Have the equivalent of ten (10) years of full-time relevant experience".

We declare to the best of our professional knowledge and belief, we have met the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312.

It has been a pleasure to be of service. If any questions arise, please contact our office.

Sincerely,



Paul J. Robinson
Environmental Professional
Priority One Environmental, Inc.

7.0 NON-SCOPE SERVICES

No additional services as listed in the ASTM Standard 1527-13 have been requested in writing and placed under contract in regards to this assessment. Including, but not limited to Asbestos testing of material at the site, and drug lab uses of the site.

8.0 APPENDIX

- 8.1 Photographs of subject site.
- 8.2 Site Figures: Site Vicinity Map, Site Topographic Map, Site Parcel Map.
- 8.3 EDR Sanborn Map Search.
- 8.4 EDR Topographic Map Package.
- 8.5 EDR Historical Aerial Photographic Package.
- 8.6 EDR Radius Report.
- 8.7 EDR City Directory Search.
- 8.8 Local Agency Records (If any were found and reviewed).
- 8.9 Professional Qualifications (Resume).

8.1 Photos



Photo #1: View of subject property.

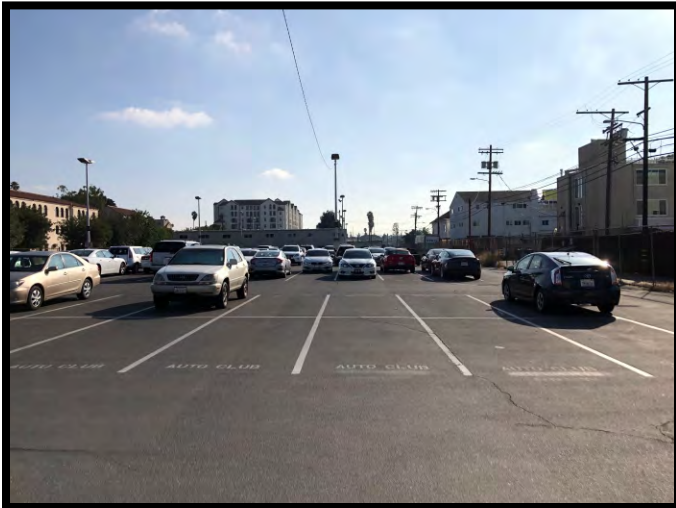


Photo #2: View of subject property looking southeast.



Photo #3: View of northwest portion of property.



Photo #4: View of looking north from northwest corner of subject property.



Photo #5: View of southeast side of property



Photo #6: View of north most entrance along 27th street.



Photo #7: View of alleyway looking northwest.



Photo #8: View of apartments and university housing to the southwest.



Photo #9: View of apartment to the northwest.



Photo #10: View of front of apartment to the northwest.



Photo #11: View of apartment building to southeast.



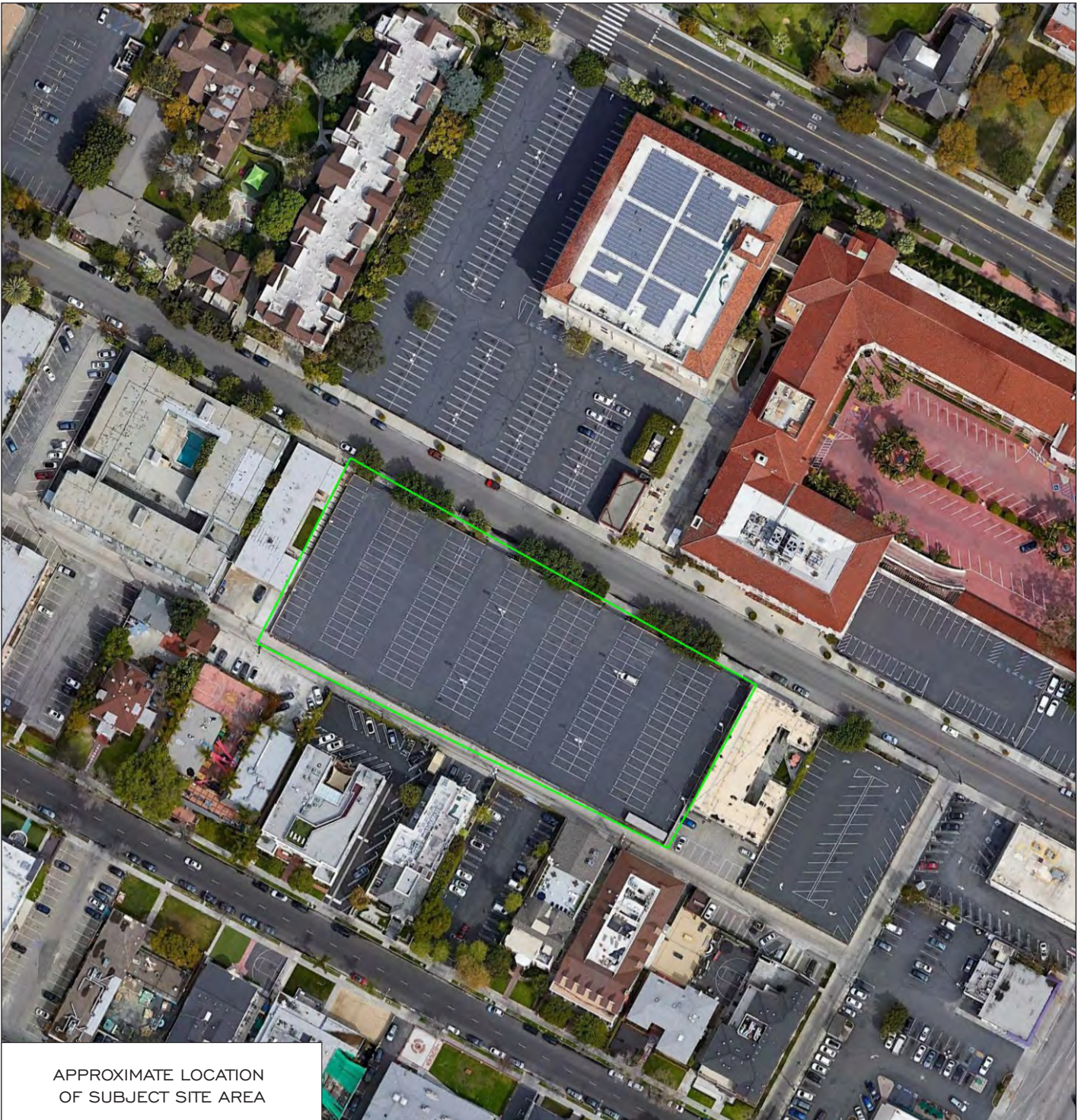
Photo #12: View of AAA property to the northeast.



Photo #13: View of garage entrance on AAA property to northeast.



Photo #14: View of northwest portion of AAA property to the northeast.



APPROXIMATE LOCATION
OF SUBJECT SITE AREA

FIGURE 1 - VICINITY MAP



PRIORITY ONE ENVIRONMENTAL
LOS ANGELES - TULSA - CLEVELAND
19528 VENTURA BOULEVARD, # 268, LOS ANGELES, CALIFORNIA 91356
V/F (800) 704-4193 WWW.PRIORITY1ENVIRONMENTAL.COM

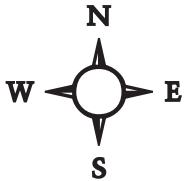


FIGURE 1

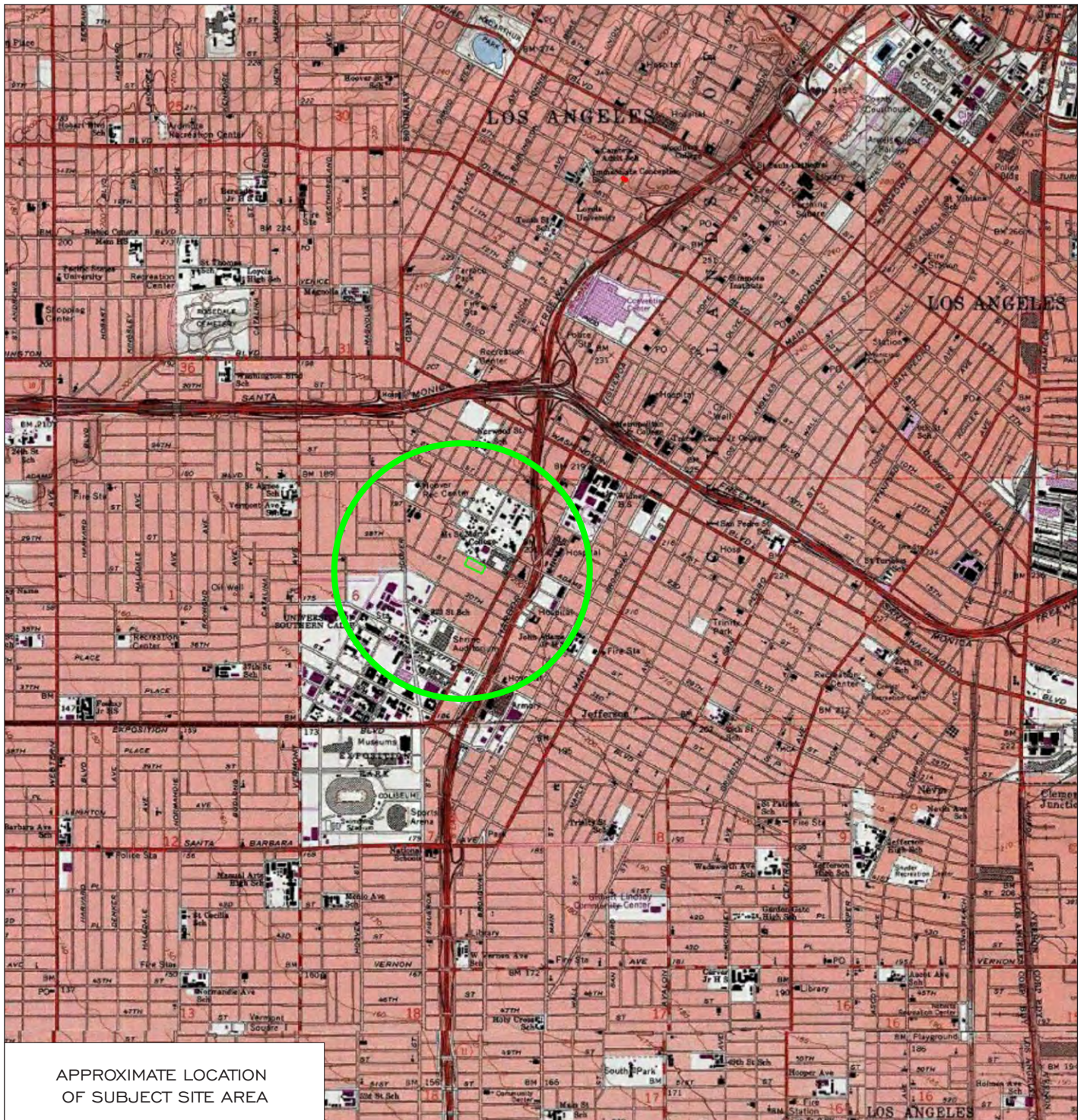


FIGURE 2 - LOCATION MAP



PRIORITY ONE ENVIRONMENTAL
 LOS ANGELES - TULSA - CLEVELAND
 19528 VENTURA BOULEVARD, # 268, LOS ANGELES, CALIFORNIA 91356
 V/F (800) 704-4193 WWW.PRIORITY1ENVIRONMENTAL.COM

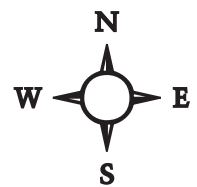


FIGURE 2



FIGURE 3 - PARCEL MAP



PRIORITY ONE ENVIRONMENTAL
LOS ANGELES - TULSA - CLEVELAND
19528 VENTURA BOULEVARD, # 268, LOS ANGELES, CALIFORNIA 91356
V/F (800) 704-4193 WWW.PRIORITY1ENVIRONMENTAL.COM

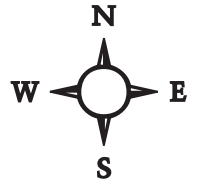


FIGURE 3

P1E-19-12-08

2601 South Figueroa Street

Los Angeles, CA 90007

Inquiry Number: 5917309.3

December 26, 2019

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

12/26/19

Site Name:

P1E-19-12-08
2601 South Figueroa Street
Los Angeles, CA 90007
EDR Inquiry # 5917309.3

Client Name:

Priority One Environmental, Inc.
19528 Ventura Boulevard, #268
Tarzana, CA 91356
Contact: Paul Robinson



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Priority One Environmental, Inc. were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Certification # DCE0-4CC0-9FB1
PO # P1E-19-12-08
Project P1E-19-12-08

Maps Provided:

1970	1956
1969	1955
1968	1954
1966	1950
1960	1922
1959	1907
1958	1900
1957	1894



Sanborn® Library search results

Certification #: DCE0-4CC0-9FB1

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

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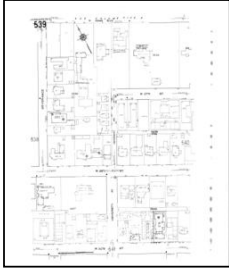
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Sanborn Sheet Key

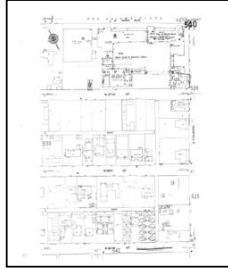
This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



1970 Source Sheets



Volume 5, Sheet 539
1970



Volume 5, Sheet 540
1970



Volume 5A, Sheet 28a
1970

1969 Source Sheets

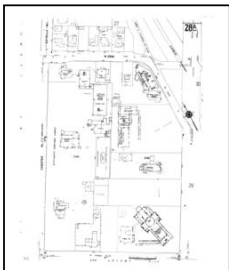


Volume 5A, Sheet 26a
1969

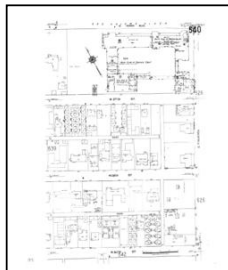


Volume 5A, Sheet 28a
1969

1968 Source Sheets

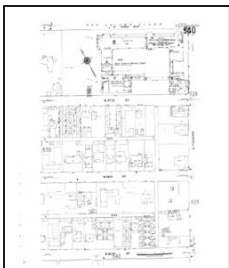


Volume 5A, Sheet 28a
1968



Volume 5, Sheet 540
1968

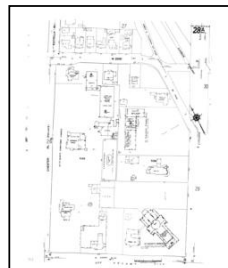
1966 Source Sheets



Volume 5, Sheet 540
1966



Volume 5A, Sheet 26a
1966



Volume 5A, Sheet 28a
1966

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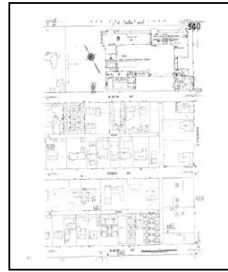
1960 Source Sheets



Volume 5A, Sheet 28a
1960

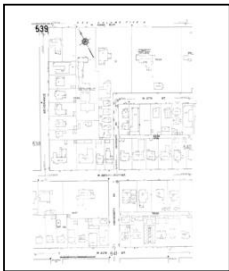


Volume 5, Sheet 539
1960



Volume 5, Sheet 540
1960

1959 Source Sheets

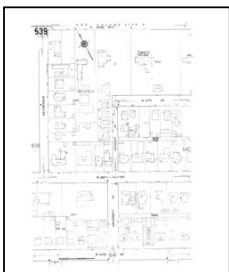


Volume 5, Sheet 539
1959

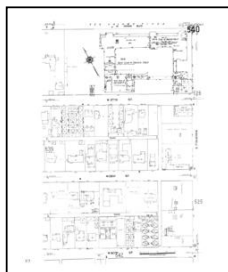


Volume 5, Sheet 540
1959

1958 Source Sheets

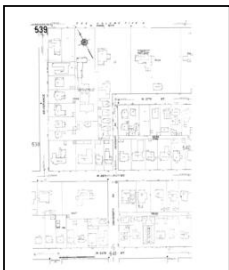


Volume 5, Sheet 539
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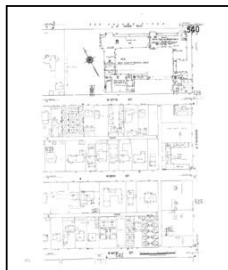


Volume 5, Sheet 540
1958

1957 Source Sheets



Volume 5, Sheet 539
1957



Volume 5, Sheet 540
1957

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Volume 5A, Sheet 28a
1956

1955 Source Sheets



Volume 5A, Sheet 26a
1955



Volume 5A, Sheet 28a
1955

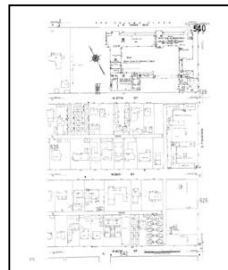
1954 Source Sheets



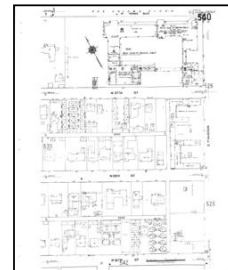
Volume 5A, Sheet 28a
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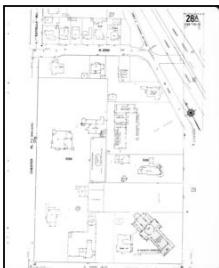
Volume 5, Sheet 539
1954



Volume 5, Sheet 540
1954



Volume 5, Sheet 540
1954



Volume 5A, Sheet 28a
1954

Sanborn Sheet Key

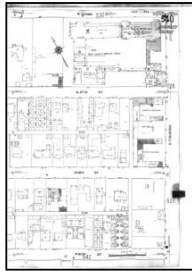
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1950 Source Sheets

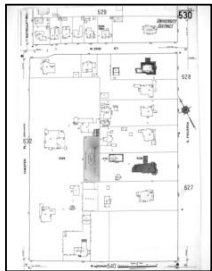


Volume 5, Sheet 530
1950

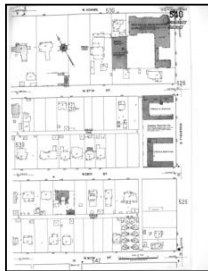


Volume 5, Sheet 540
1950

1922 Source Sheets

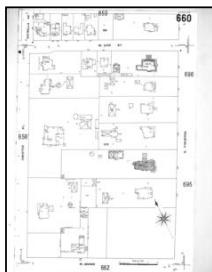


Volume 5, Sheet 530
1922

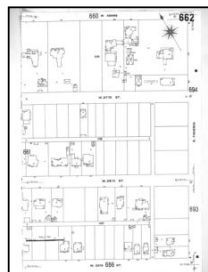


Volume 5, Sheet 540
1922

1907 Source Sheets

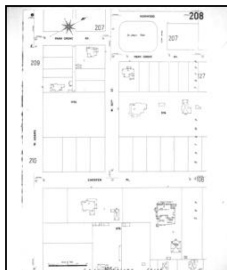


Volume 6, Sheet 660
1907

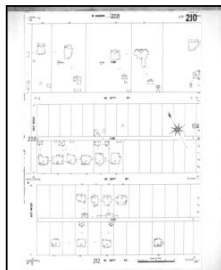


Volume 6, Sheet 662
1907

1900 Source Sheets



Volume 4, Sheet 208
1900



Volume 4, Sheet 210
1900

Sanborn Sheet Key

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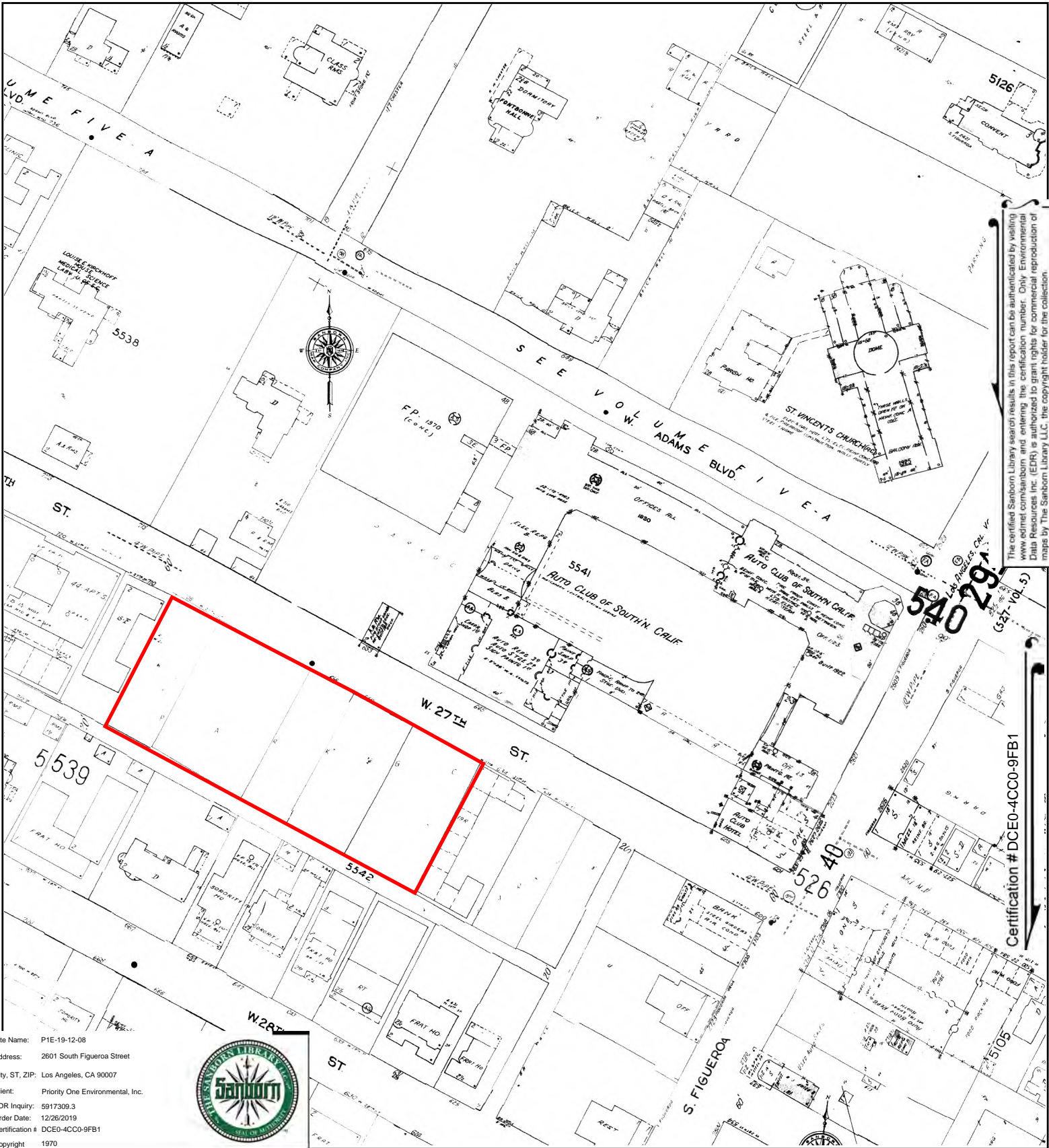
1894 Source Sheets



Volume 3, Sheet 104
1894



Volume 3, Sheet 105
1894



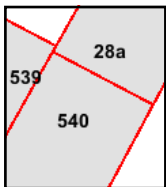
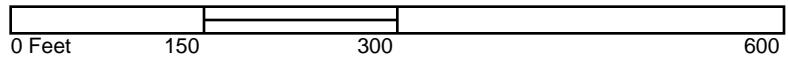
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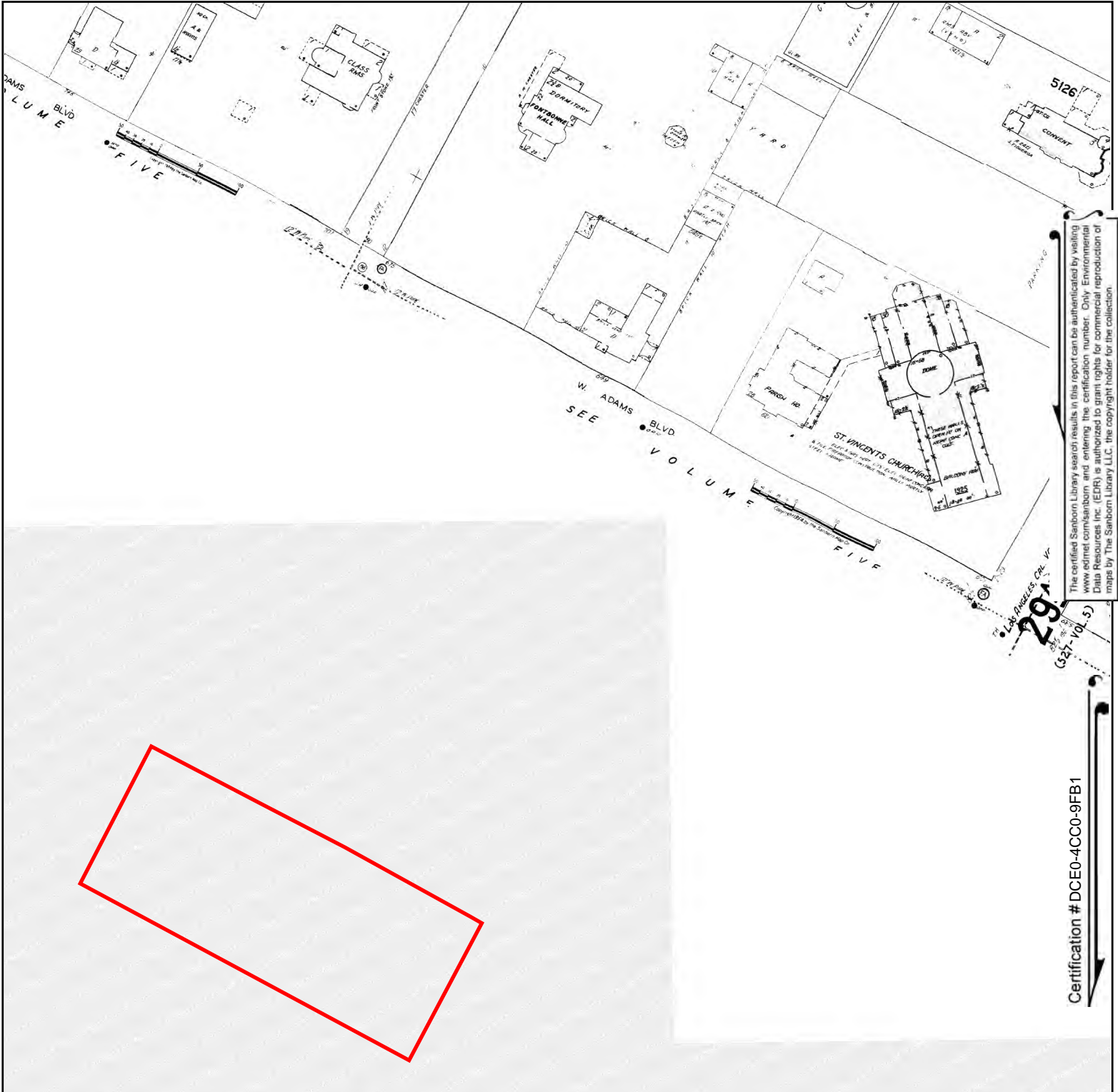


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Volume 5A, Sheet 28a
 Volume 5, Sheet 540
 Volume 5, Sheet 539





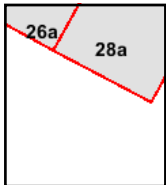
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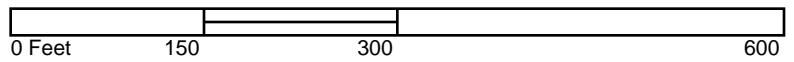
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 Copyright 1969

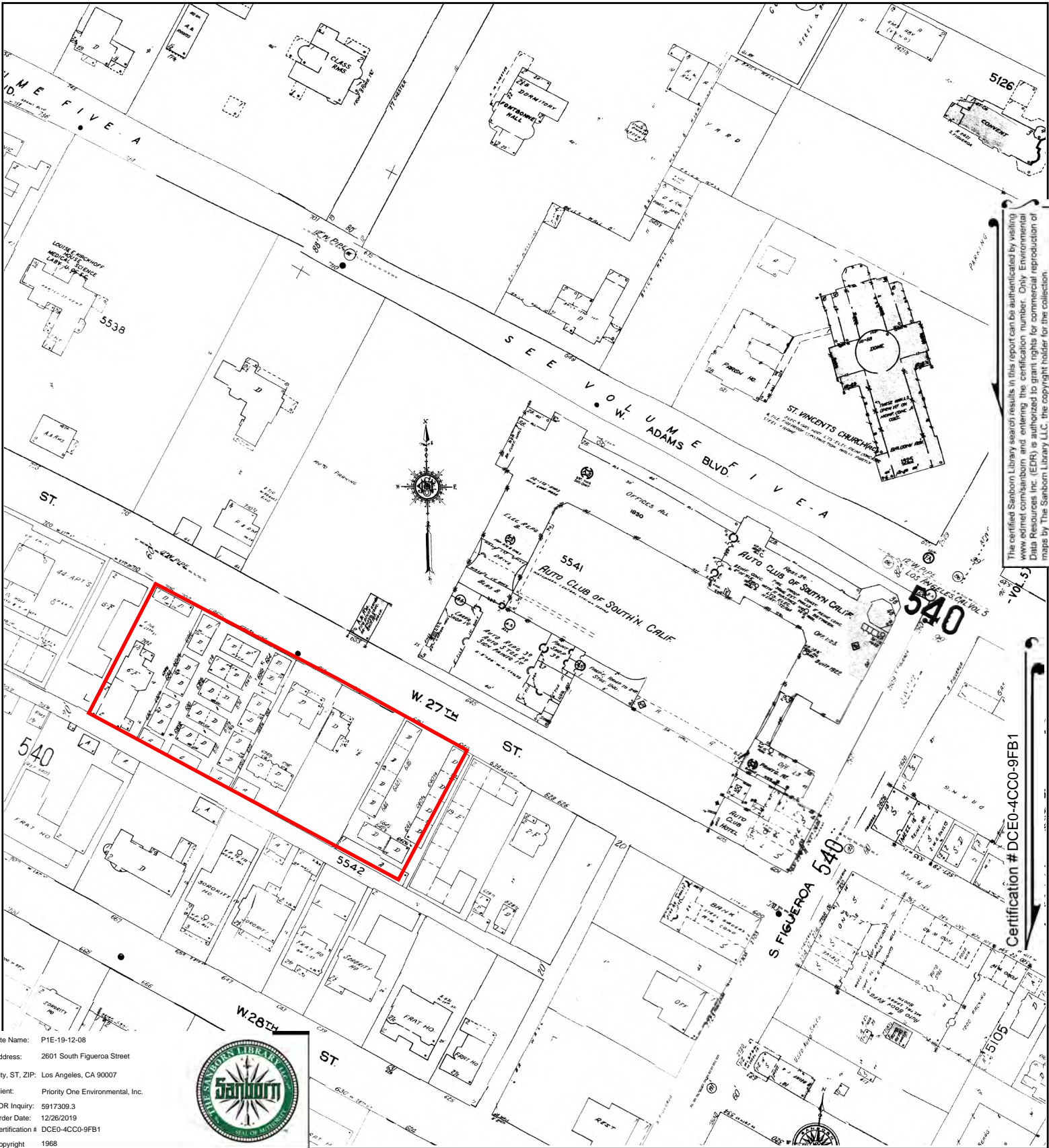


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Volume 5A, Sheet 28a
 Volume 5A, Sheet 26a





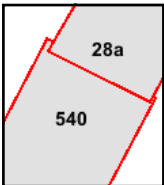
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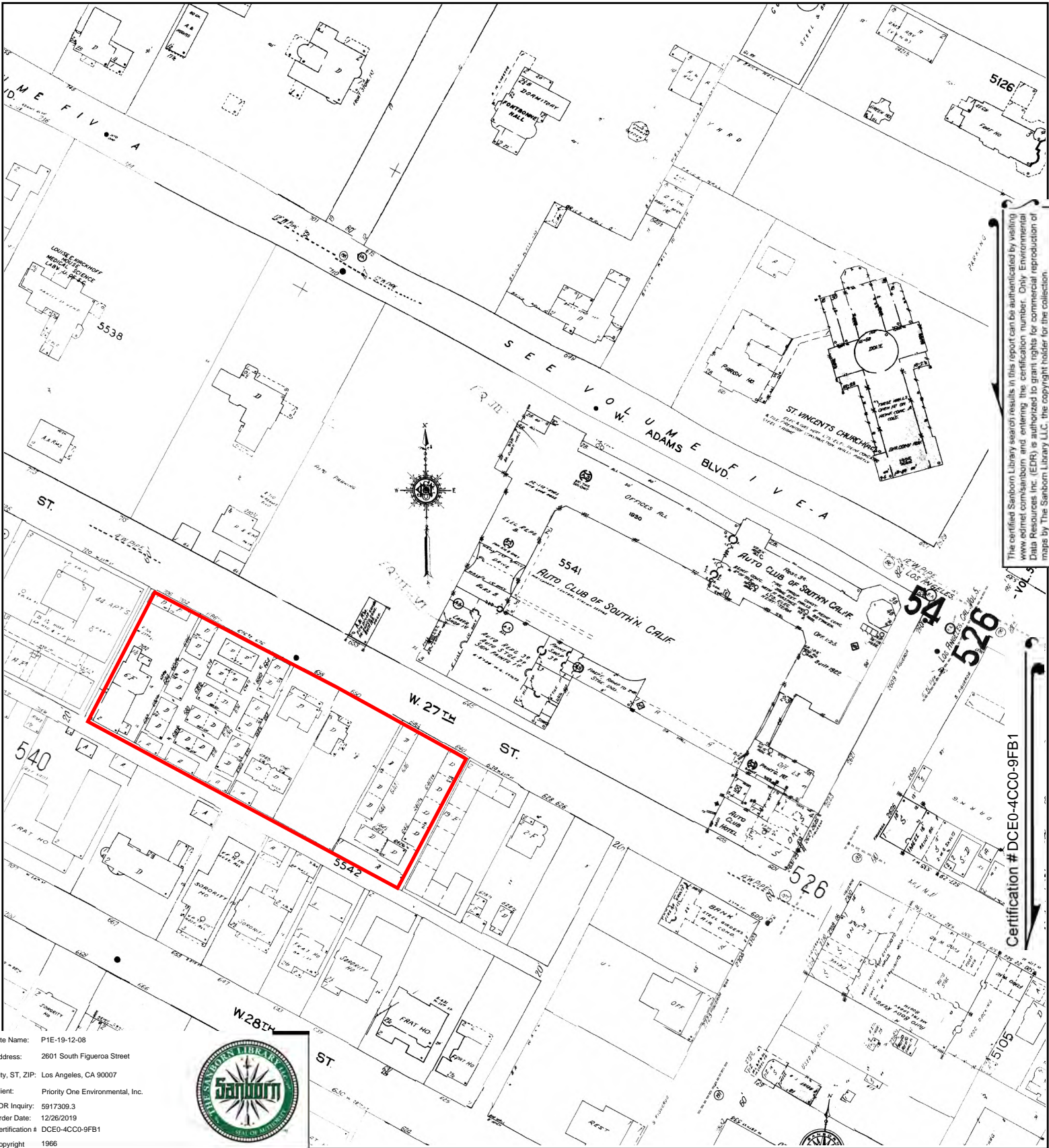


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Volume 5, Sheet 340
 Volume 5A, Sheet 28a





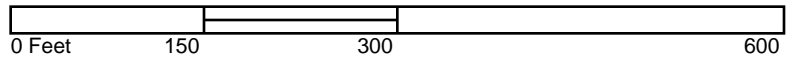
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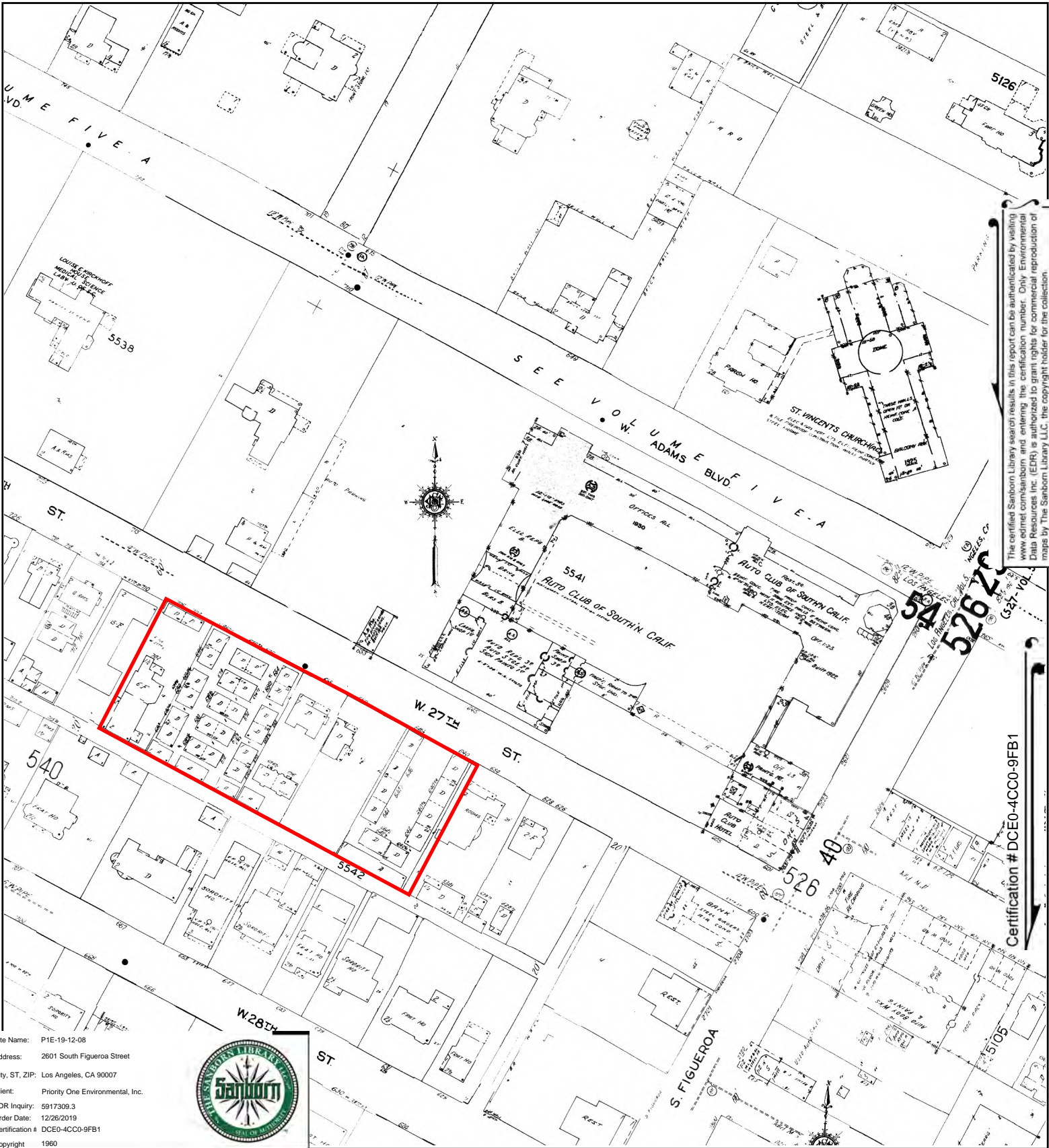


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Volume 5A, Sheet 28a
 Volume 5A, Sheet 26a
 Volume 5, Sheet 540





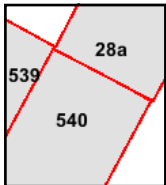
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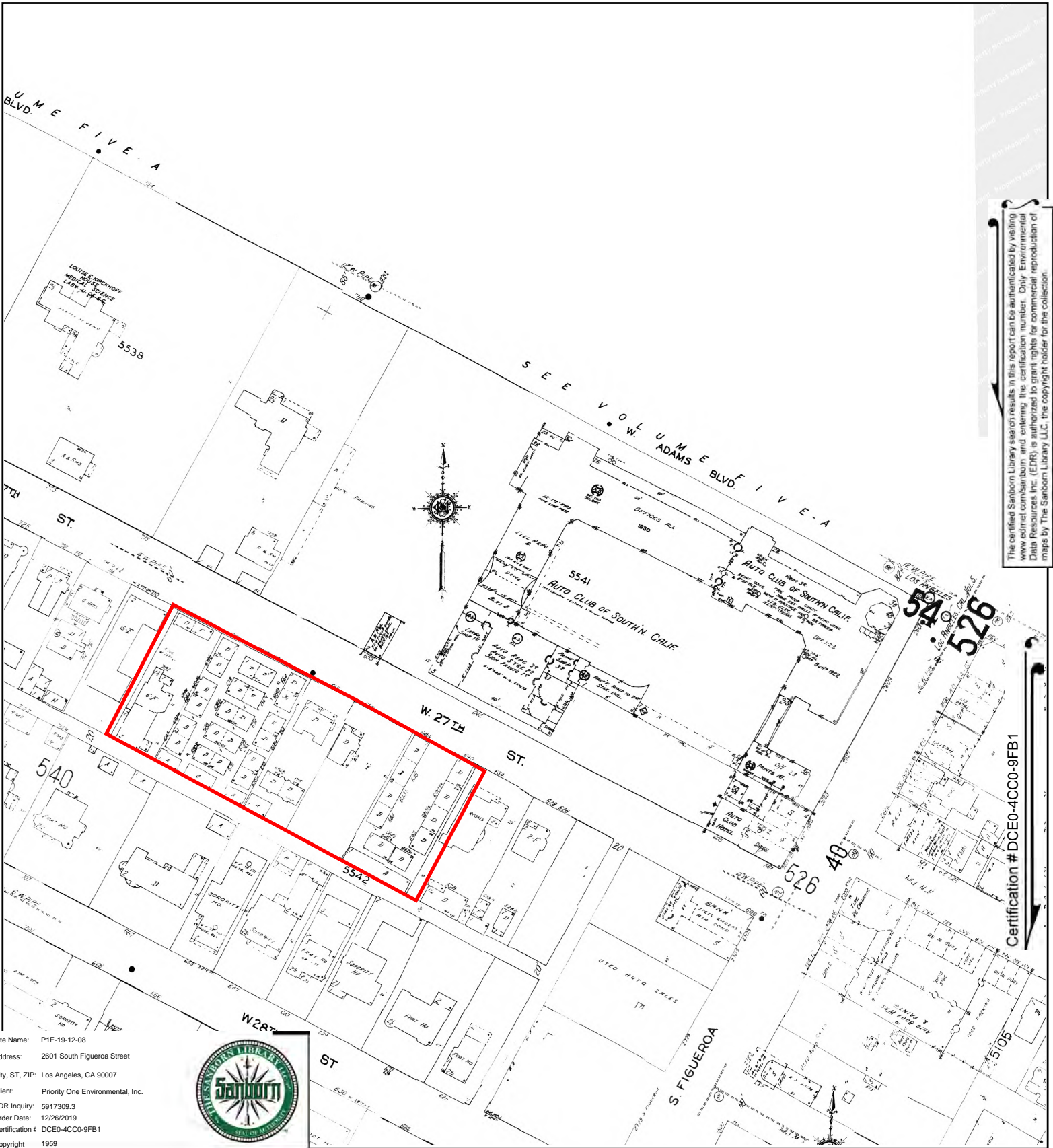


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Volume 5, Sheet 540
 Volume 5, Sheet 539
 Volume 5A, Sheet 28a





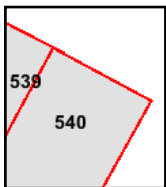
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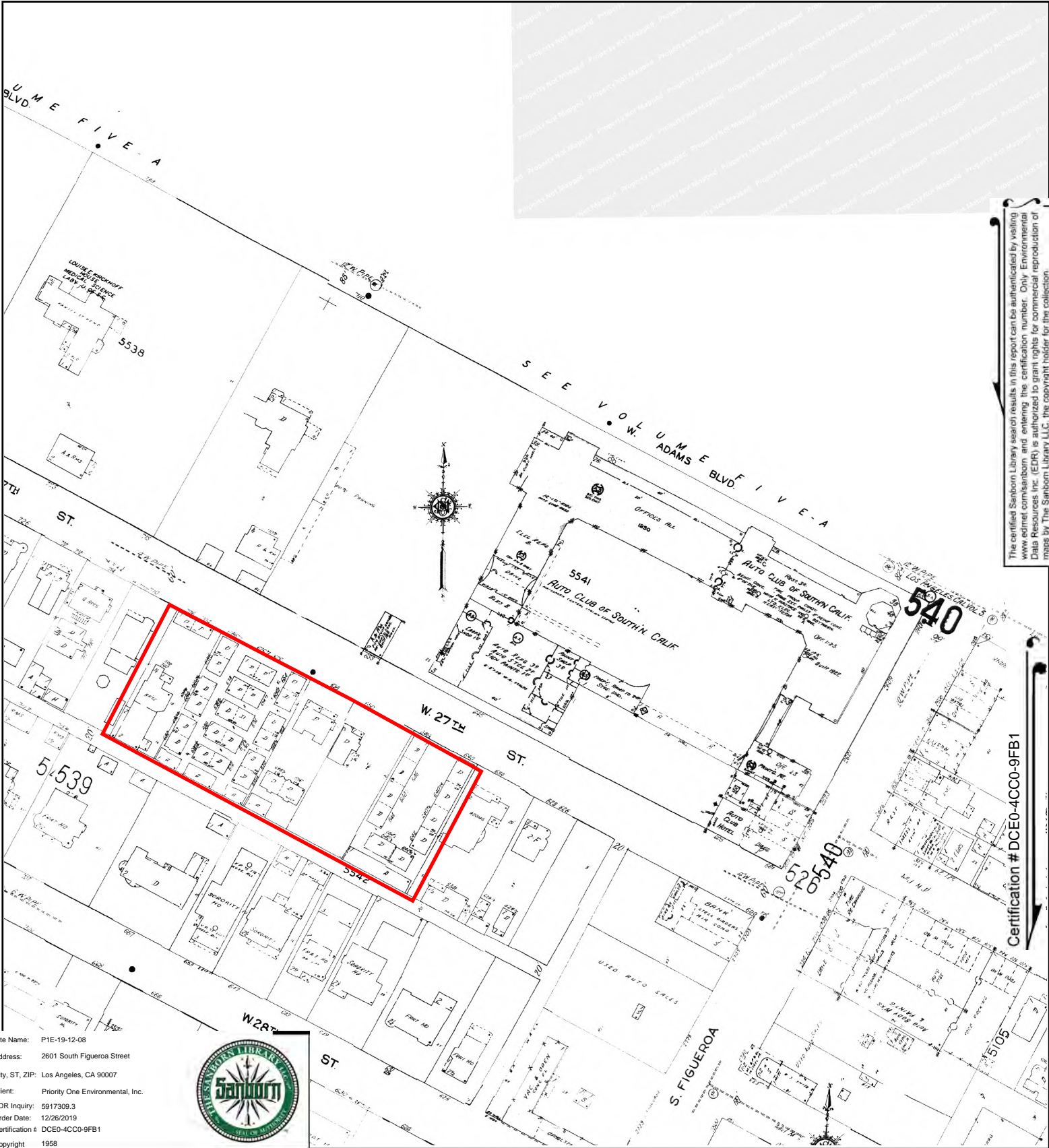


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Volume 5, Sheet 540
 Volume 5, Sheet 539





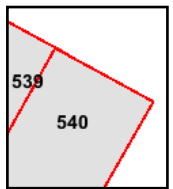
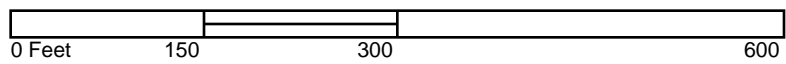
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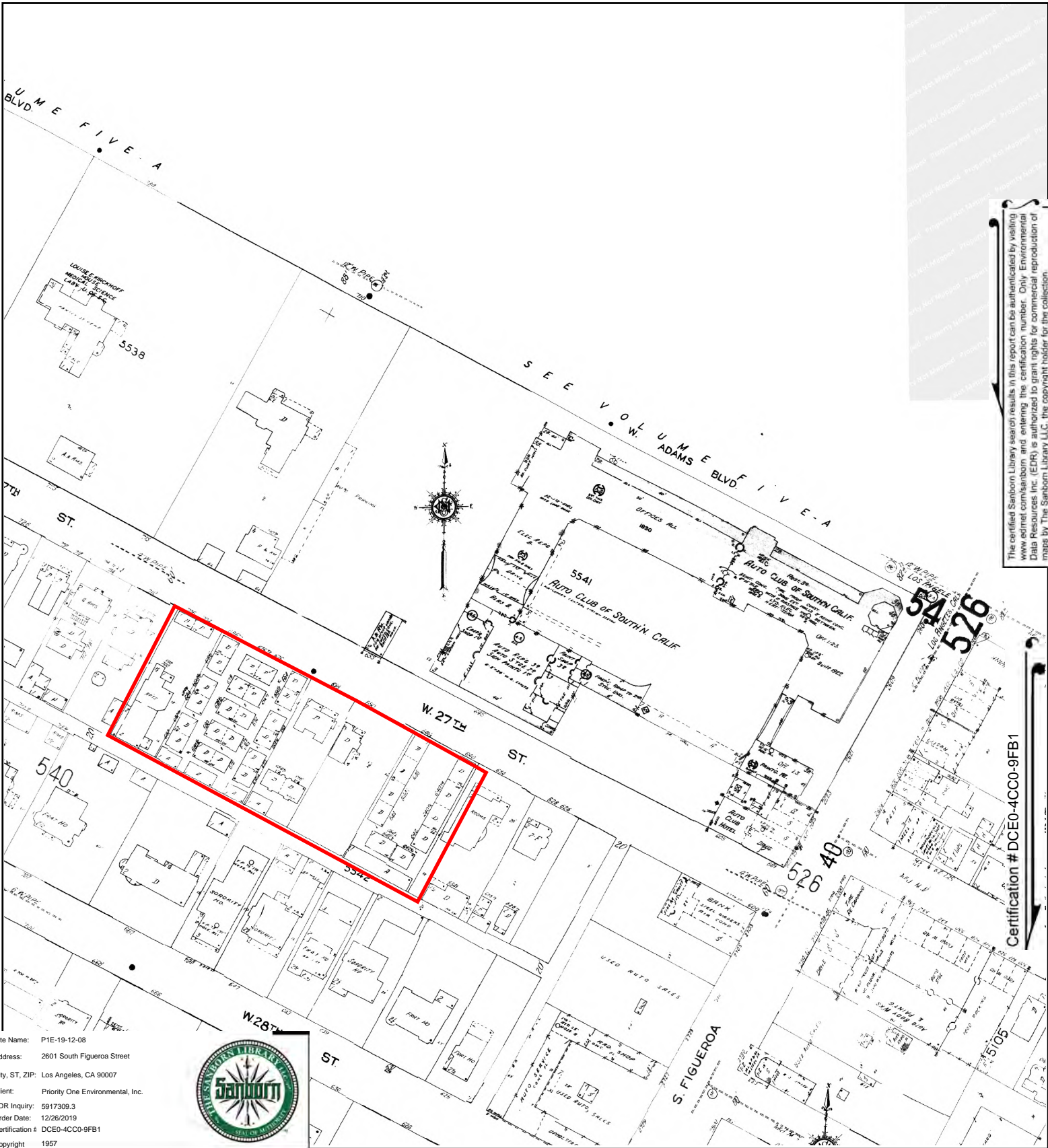


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Volume 5, Sheet 540
 Volume 5, Sheet 539





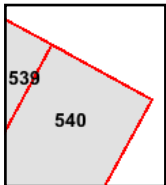
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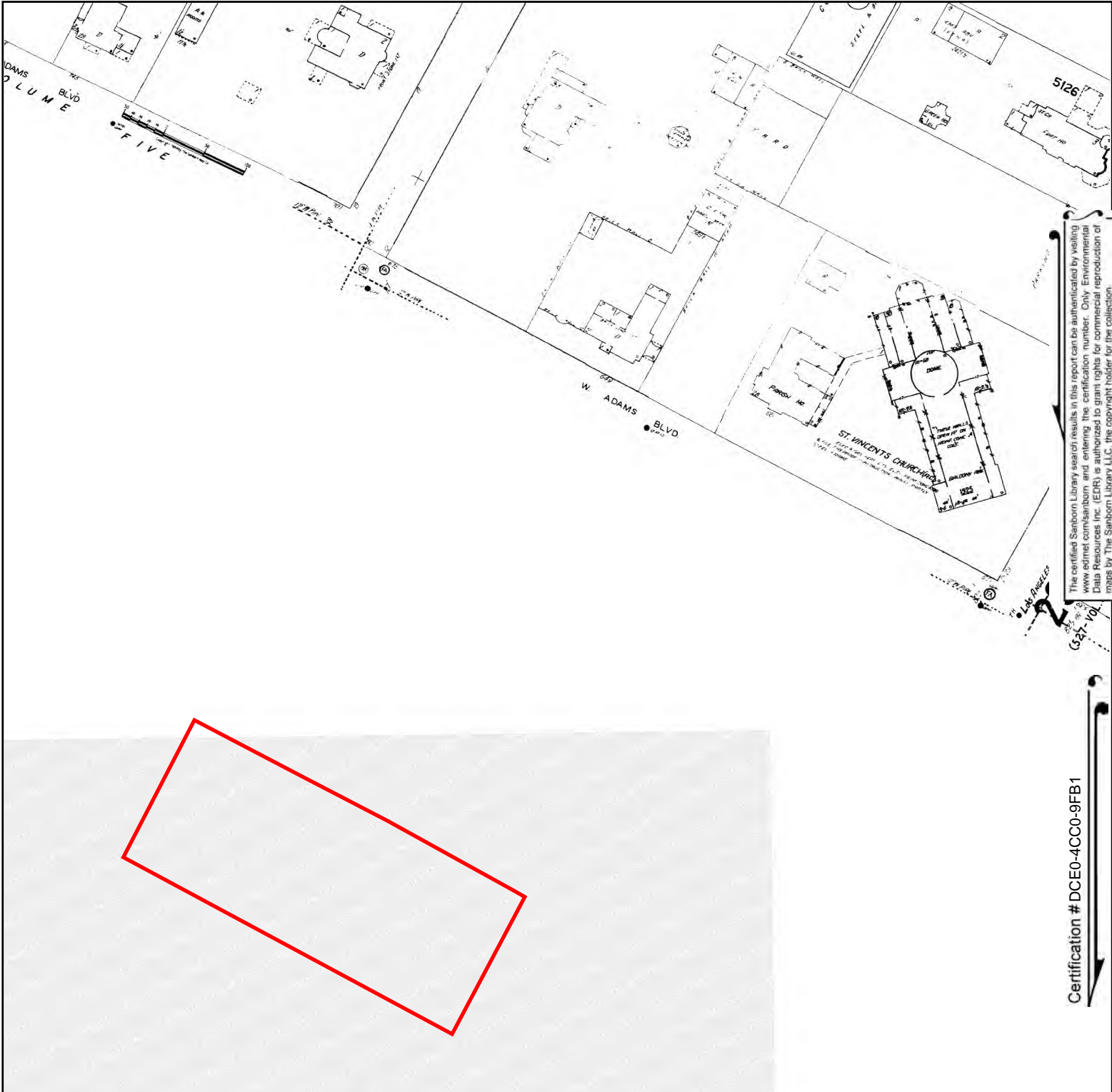


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 Volume 5, Sheet 539

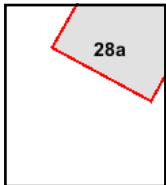




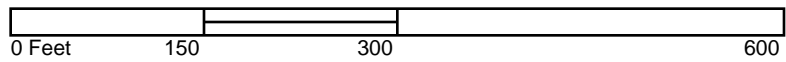
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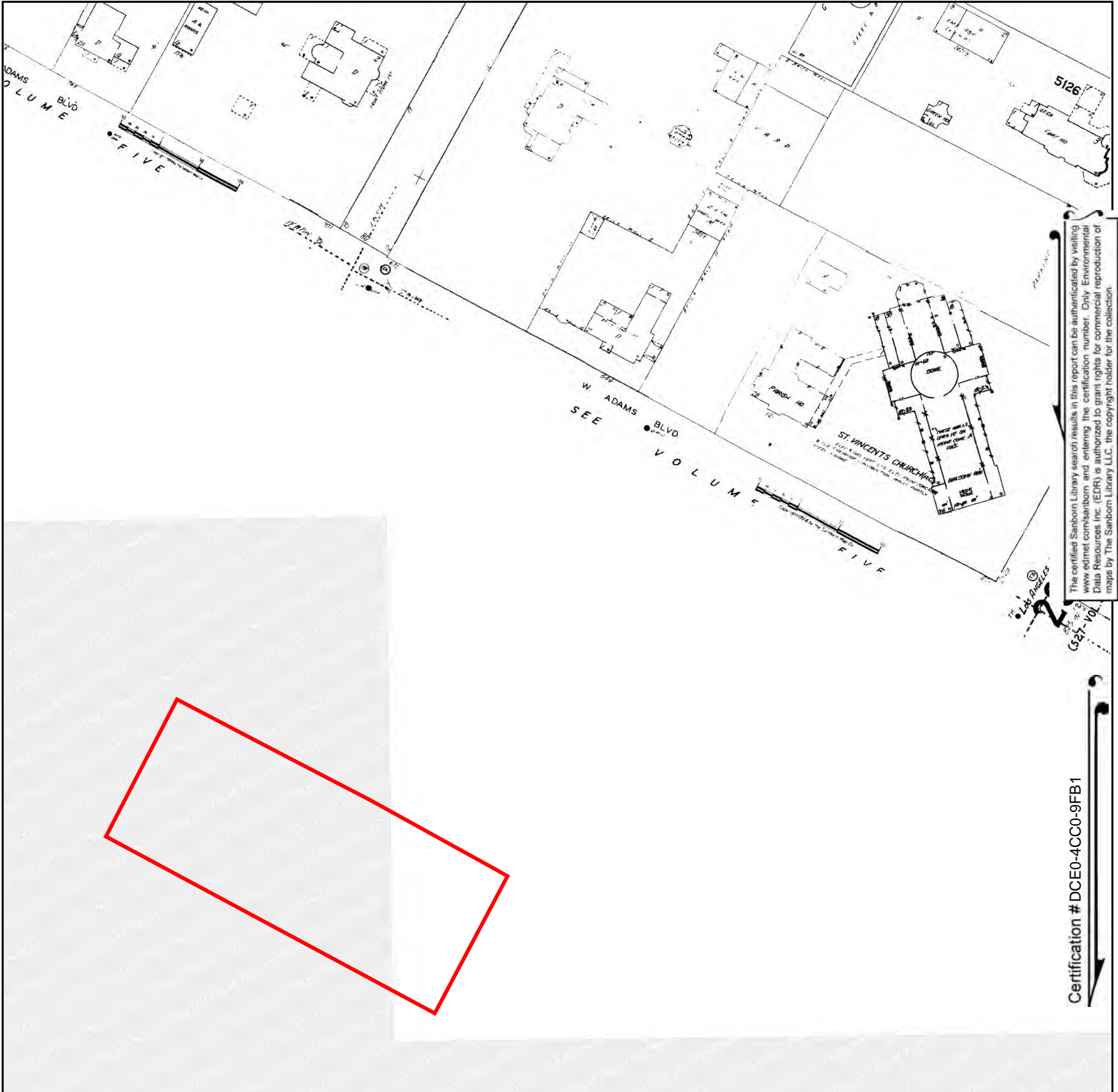


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Volume 5A, Sheet 28a





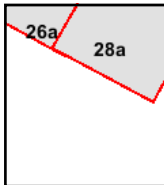
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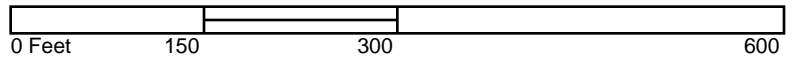
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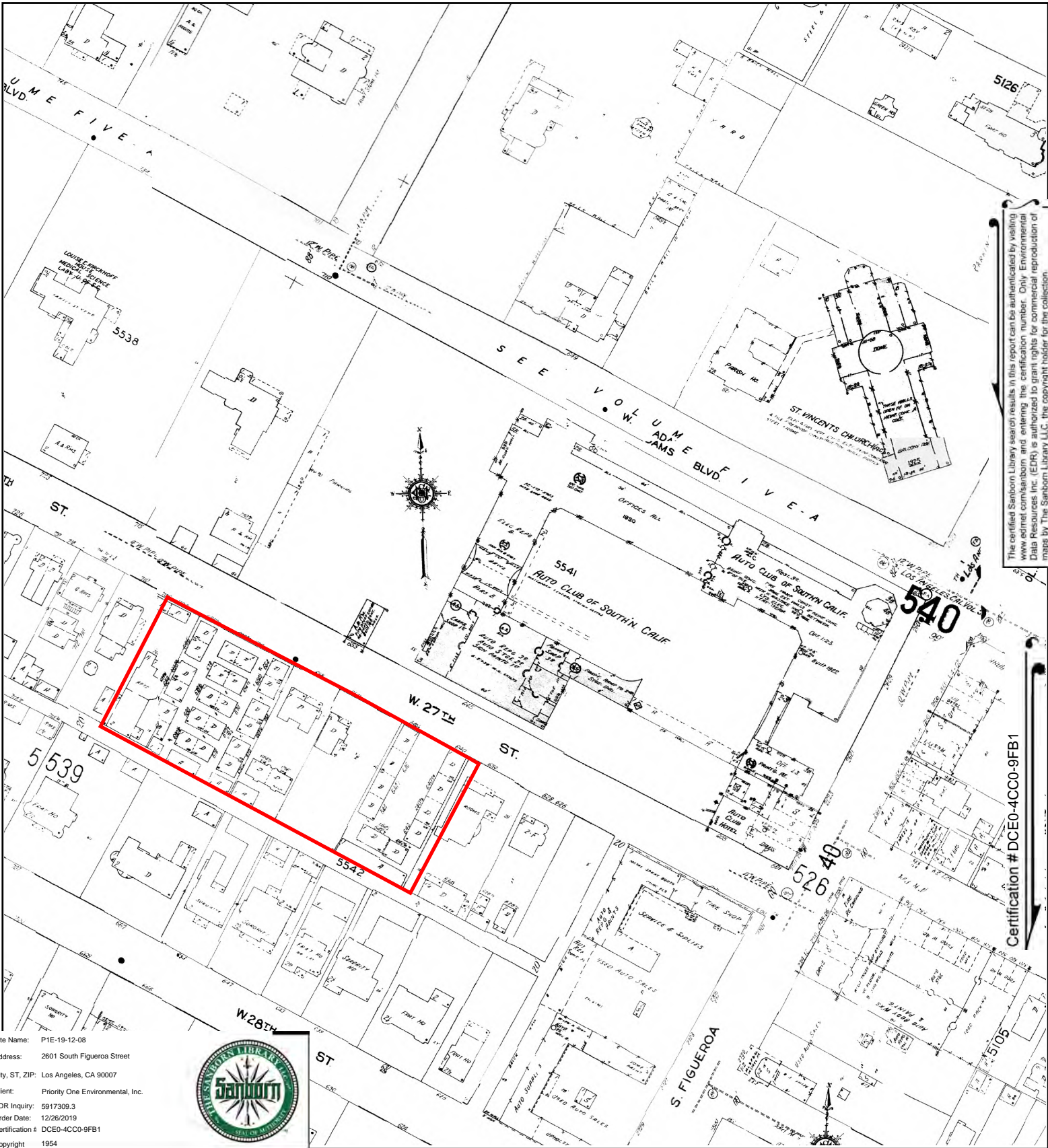


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Volume 5A, Sheet 28a
 Volume 5A, Sheet 26a





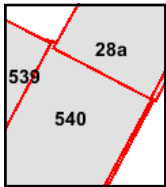
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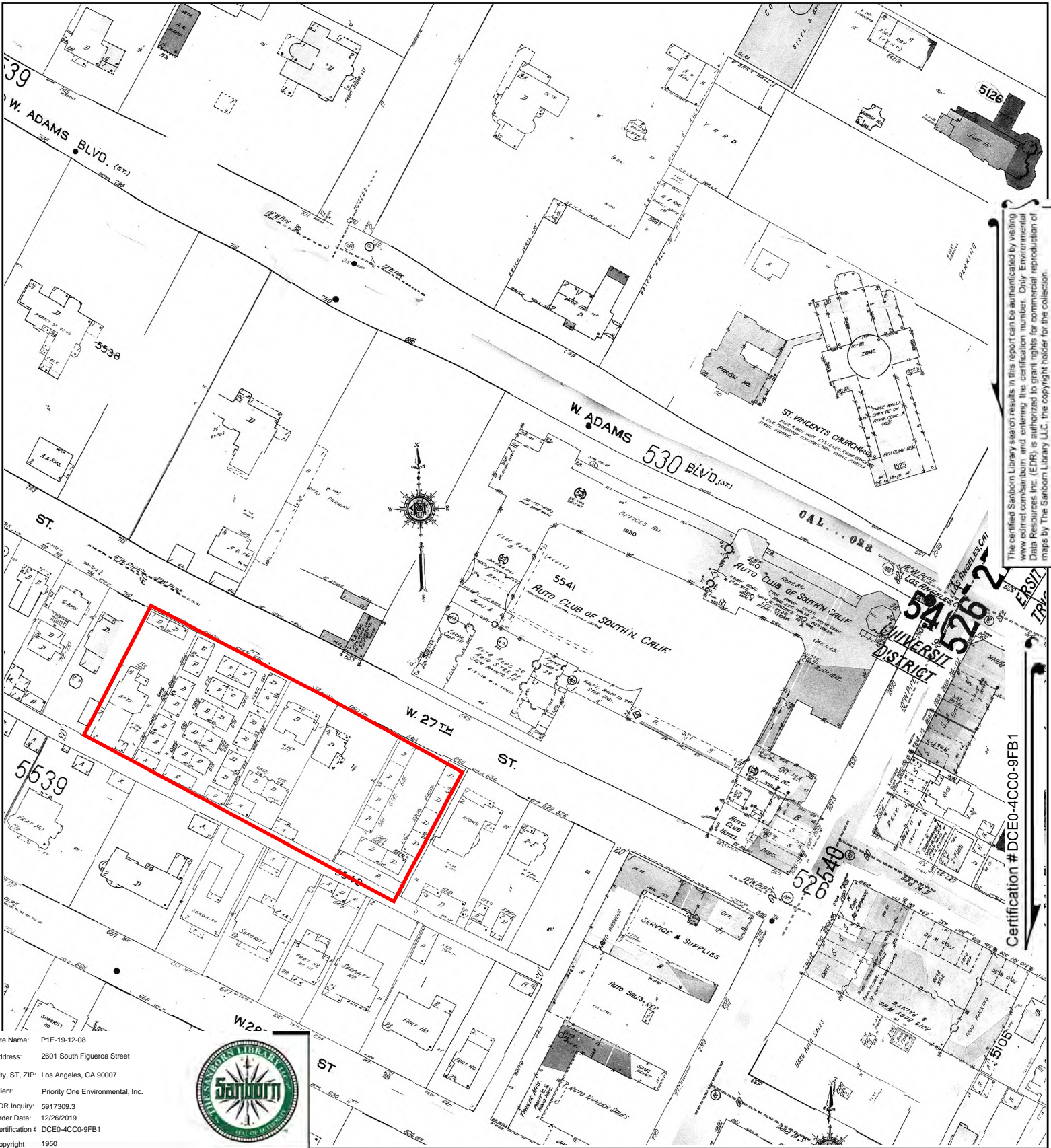


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 Volume 5, Sheet 540
 Volume 5, Sheet 539
 Volume 5A, Sheet 28a





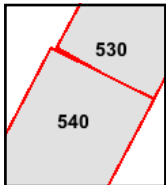
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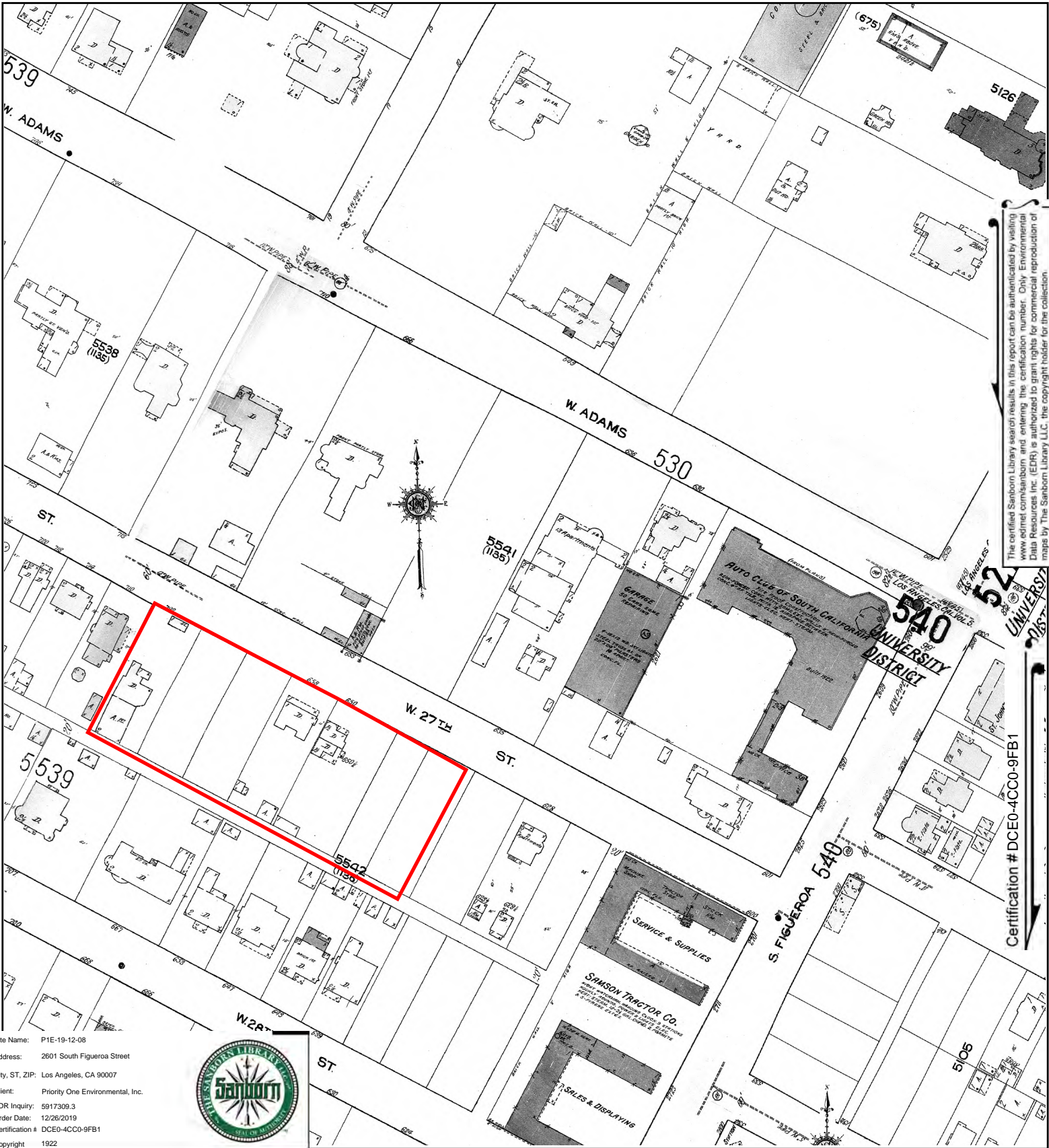


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Volume 5, Sheet 540
 Volume 5, Sheet 530





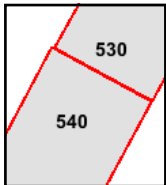
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 Address: 2601 South Figueroa Street
 City, ST, ZIP: Los Angeles, CA 90007
 Client: Priority One Environmental, Inc.
 EDR Inquiry: 5917309.3
 Order Date: 12/26/2019
 Certification # DCE0-4CC0-9FB1
 Copyright: 1922

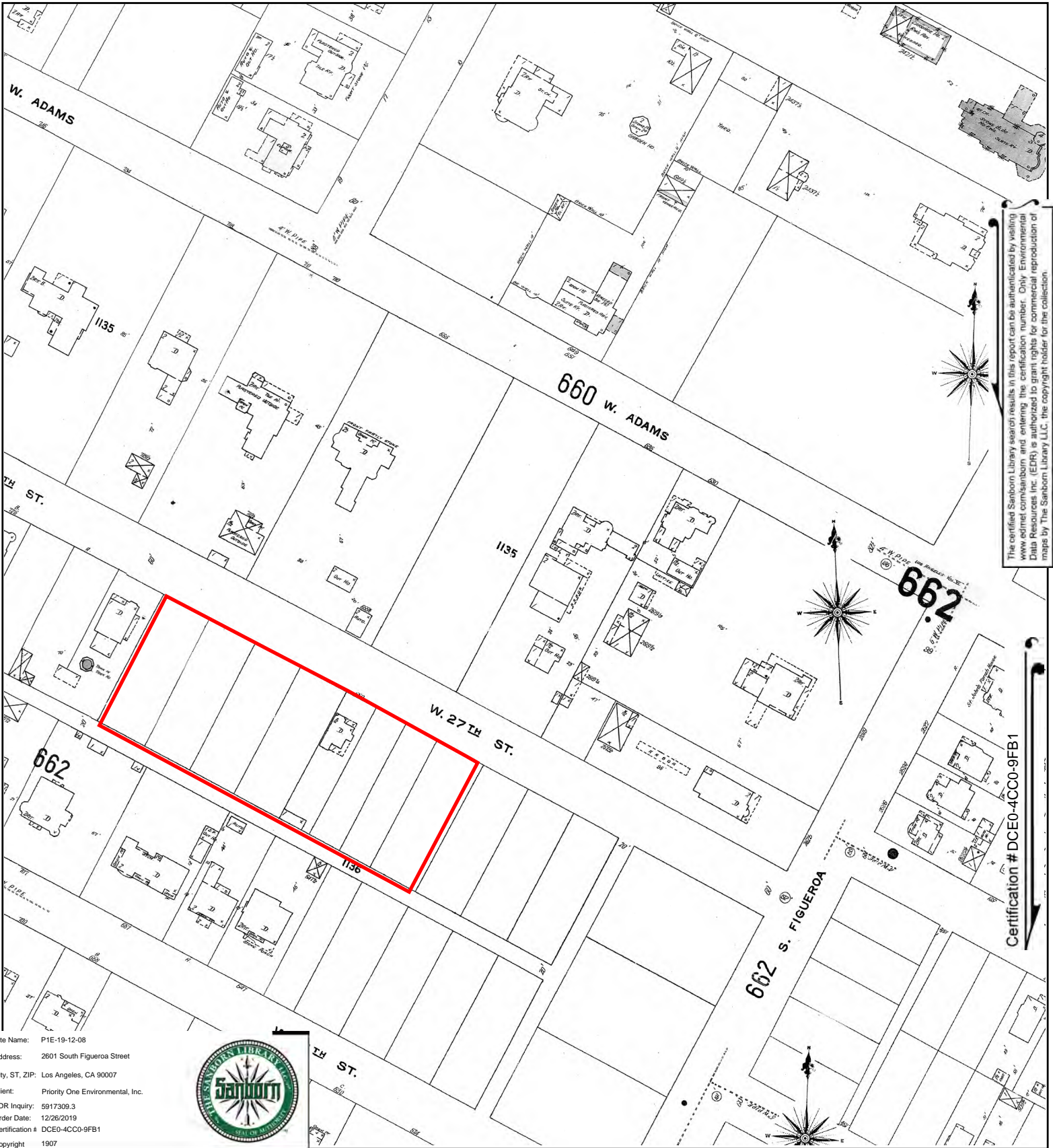


This Certified Sanborn Map combines the following sheets.
 Outlined areas indicate map sheets within the collection.



Volume 5, Sheet 540
 Volume 5, Sheet 530





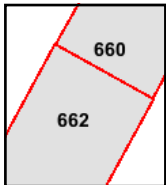
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Certification # DCE0-4CC0-9FB1

Site Name: P1E-19-12-08
 Address: 2601 South Figueroa Street
 City, ST, ZIP: Los Angeles, CA 90007
 Client: Priority One Environmental, Inc.
 EDR Inquiry: 5917309.3
 Order Date: 12/26/2019
 Certification # DCE0-4CC0-9FB1
 Copyright 1907



This Certified Sanborn Map combines the following sheets. Outlined areas indicate map sheets within the collection.



Volume 6, Sheet 662
 Volume 6, Sheet 660





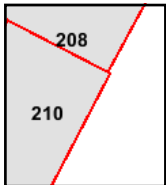
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Certification # DCE0-4CC0-9FB1

Site Name: P1E-19-12-08
 Address: 2601 South Figueroa Street
 City, ST, ZIP: Los Angeles, CA 90007
 Client: Priority One Environmental, Inc.
 EDR Inquiry: 5917309.3
 Order Date: 12/26/2019
 Certification # DCE0-4CC0-9FB1
 Copyright 1900

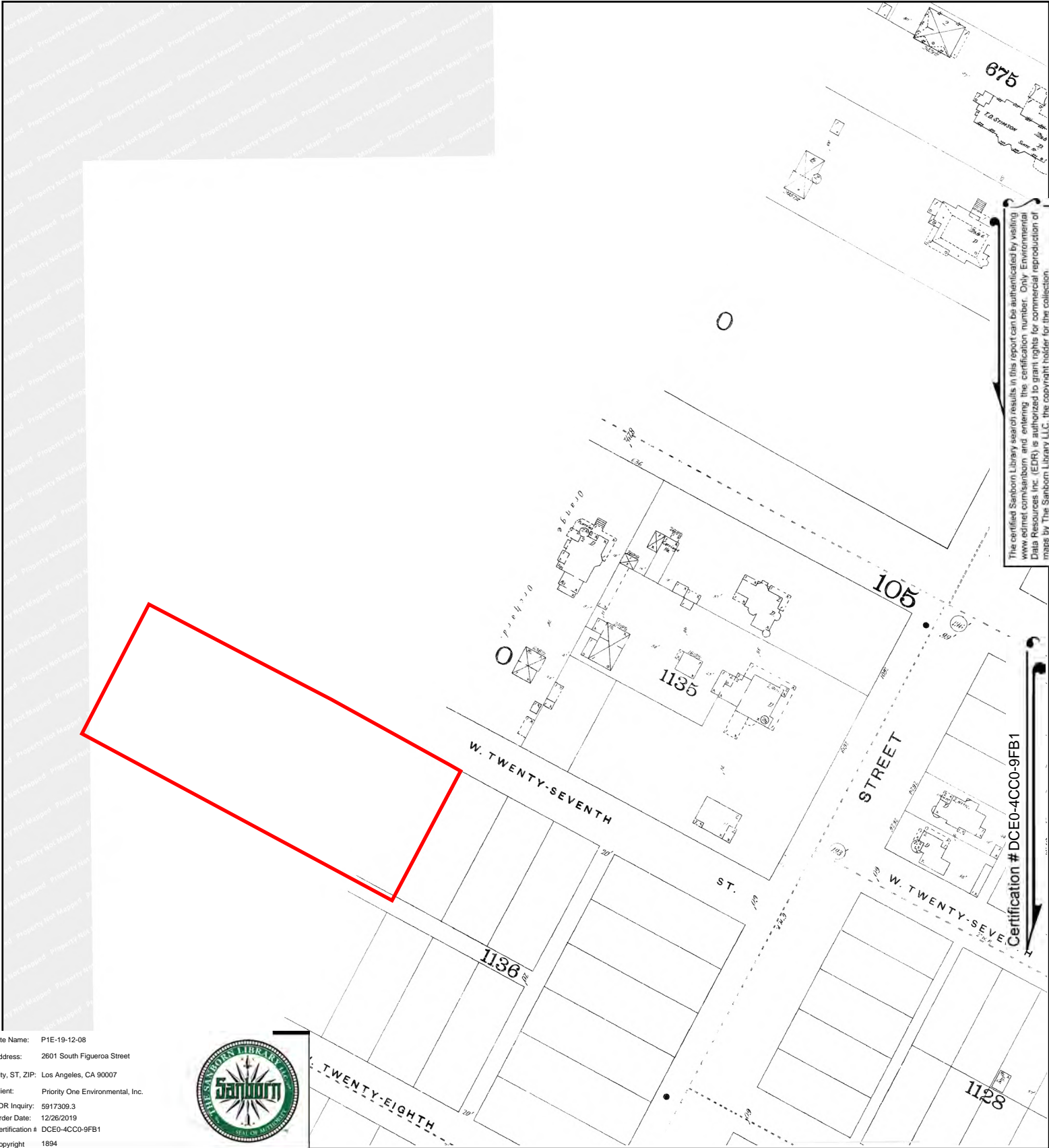


This Certified Sanborn Map combines the following sheets. Outlined areas indicate map sheets within the collection.



Volume 4, Sheet 210
 Volume 4, Sheet 208

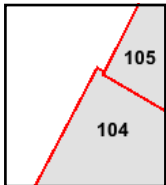
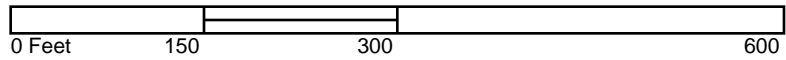




Site Name: P1E-19-12-08
 Address: 2601 South Figueroa Street
 City, ST, ZIP: Los Angeles, CA 90007
 Client: Priority One Environmental, Inc.
 EDR Inquiry: 5917309.3
 Order Date: 12/26/2019
 Certification # DCE0-4CC0-9FB1
 Copyright 1894



This Certified Sanborn Map combines the following sheets.
 Outlined areas indicate map sheets within the collection.



Volume 3, Sheet 105
 Volume 3, Sheet 104



P1E-19-12-08

2601 South Figueroa Street

Los Angeles, CA 90007

Inquiry Number: 5917309.4

December 26, 2019

EDR Historical Topo Map Report

with QuadMatch™



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topo Map Report

12/26/19

Site Name:

P1E-19-12-08
2601 South Figueroa Street
Los Angeles, CA 90007
EDR Inquiry # 5917309.4

Client Name:

Priority One Environmental, Inc.
19528 Ventura Boulevard, #268
Tarzana, CA 91356
Contact: Paul Robinson



EDR Topographic Map Library has been searched by EDR and maps covering the target property location as provided by Priority One Environmental, Inc. were identified for the years listed below. EDR's Historical Topo Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDR's Historical Topo Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s.

Search Results:

Coordinates:

P.O.#	P1E-19-12-08	Latitude:	34.028287 34° 1' 42" North
Project:	P1E-19-12-08	Longitude:	-118.277807 -118° 16' 40" West
		UTM Zone:	Zone 11 North
		UTM X Meters:	382032.74
		UTM Y Meters:	3766028.59
		Elevation:	203.34' above sea level

Maps Provided:

2012	1920
1991	1902
1981	1900
1972	1898
1966	1896
1953	1894
1928	
1921	

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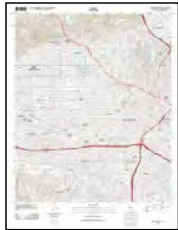
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Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2012 Source Sheets



Hollywood
2012
7.5-minute, 24000

1991 Source Sheets



Hollywood
1991
7.5-minute, 24000
Aerial Photo Revised 1978

1981 Source Sheets



Hollywood
1981
7.5-minute, 24000
Aerial Photo Revised 1978

1972 Source Sheets



Hollywood
1972
7.5-minute, 24000
Aerial Photo Revised 1972

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1966 Source Sheets



Hollywood
1966
7.5-minute, 24000
Aerial Photo Revised 1964

1953 Source Sheets



Hollywood
1953
7.5-minute, 24000
Aerial Photo Revised 1952

1928 Source Sheets



Los Angeles
1928
7.5-minute, 24000

1921 Source Sheets

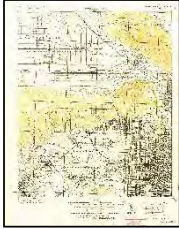


Santa Monica
1921
15-minute, 62500

Topo Sheet Key

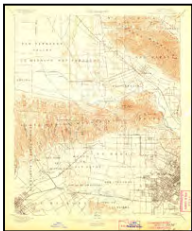
This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1920 Source Sheets



SANTA MONICA
1920
15-minute, 62500

1902 Source Sheets



Santa Monica
1902
15-minute, 62500

1900 Source Sheets



Los Angeles
1900
15-minute, 62500

1898 Source Sheets



Santa Monica
1898
15-minute, 62500

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1896 Source Sheets

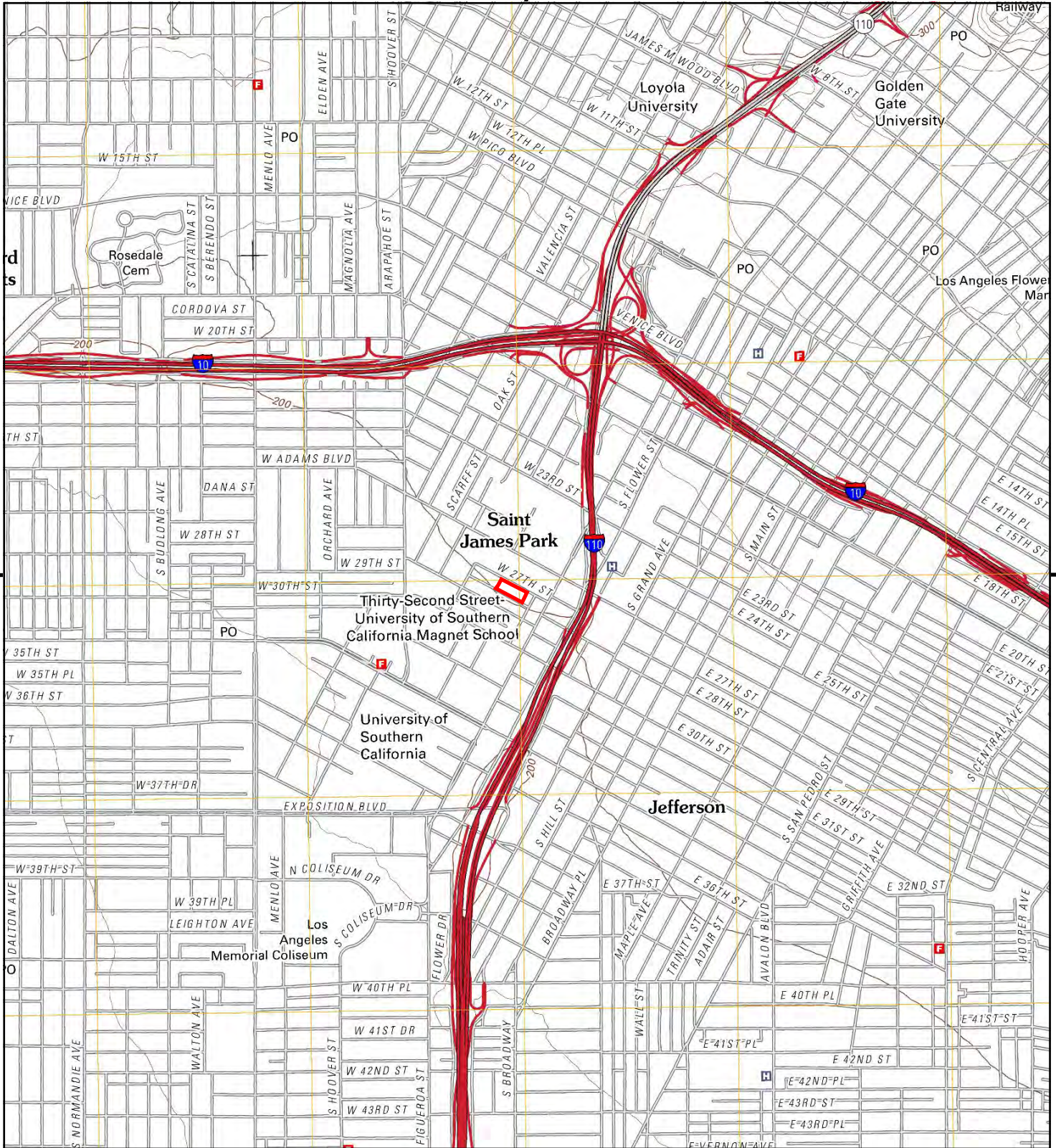


Santa Monica
1896
15-minute, 62500

1894 Source Sheets



Los Angeles
1894
15-minute, 62500



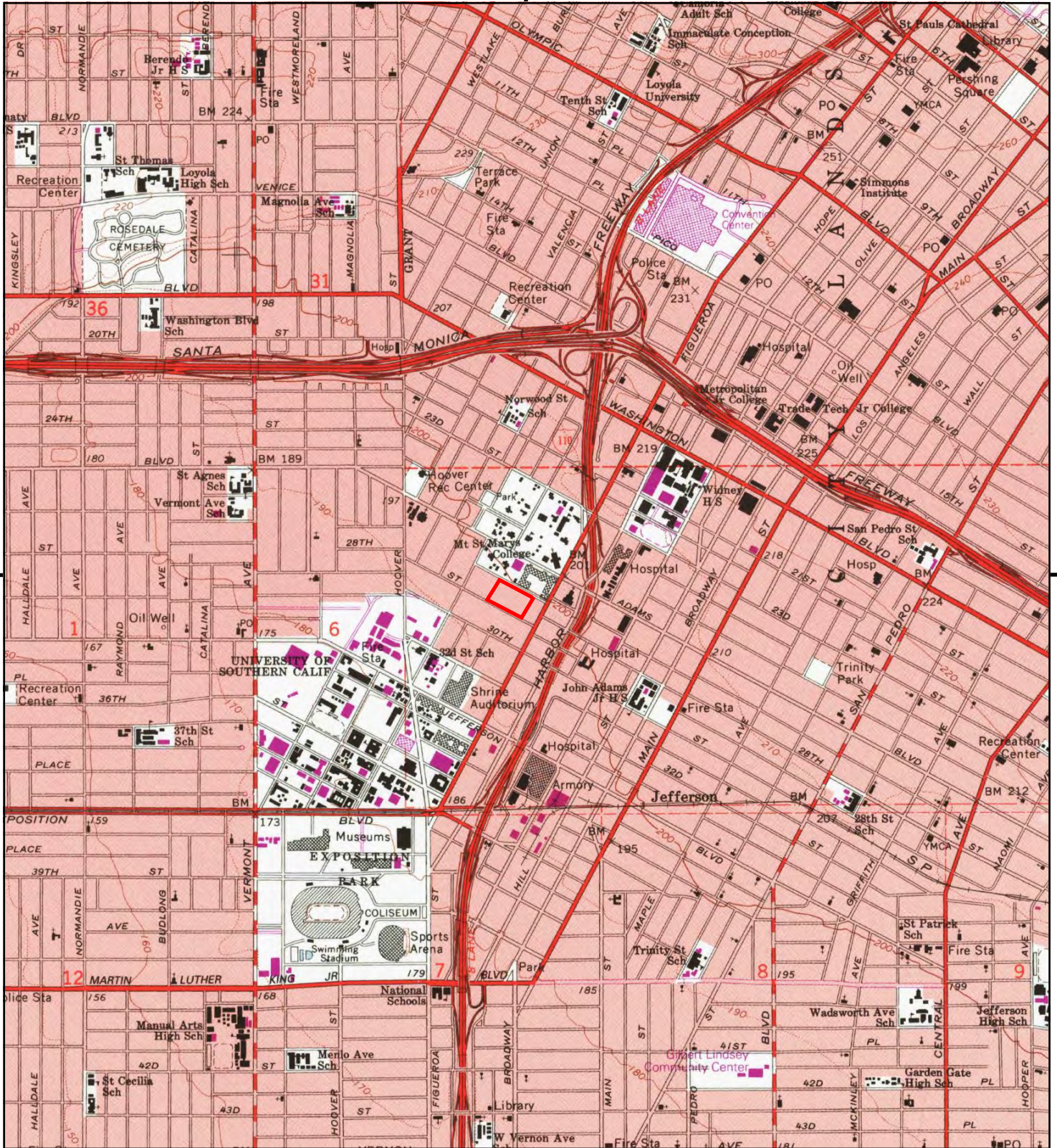
This report includes information from the following map sheet(s).



TP, Hollywood, 2012, 7.5-minute

SITE NAME: P1E-19-12-08
ADDRESS: 2601 South Figueroa Street
 Los Angeles, CA 90007
CLIENT: Priority One Environmental, Inc.





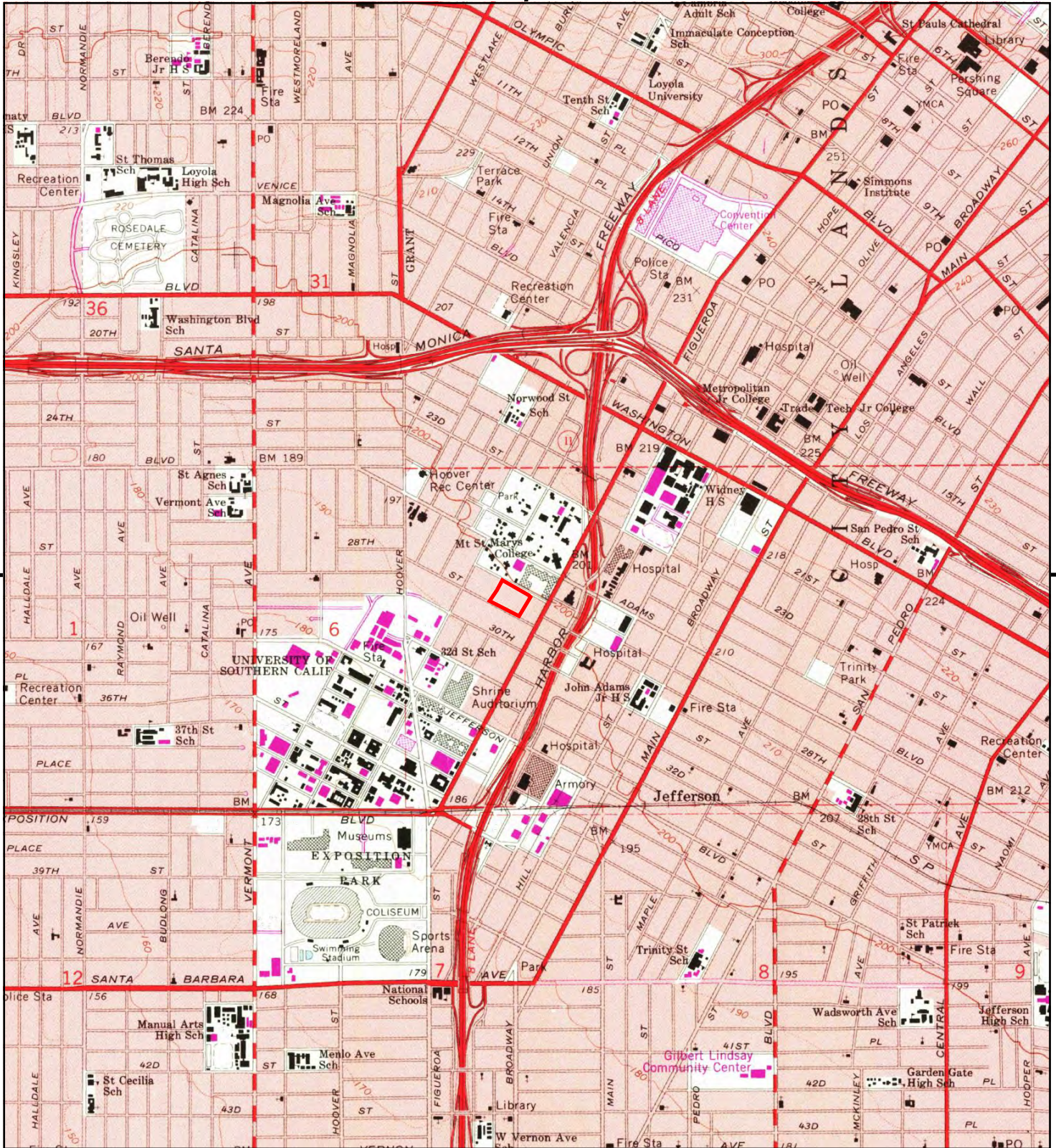
This report includes information from the following map sheet(s).



TP, Hollywood, 1991, 7.5-minute

SITE NAME: P1E-19-12-08
 ADDRESS: 2601 South Figueroa Street
 Los Angeles, CA 90007
 CLIENT: Priority One Environmental, Inc.





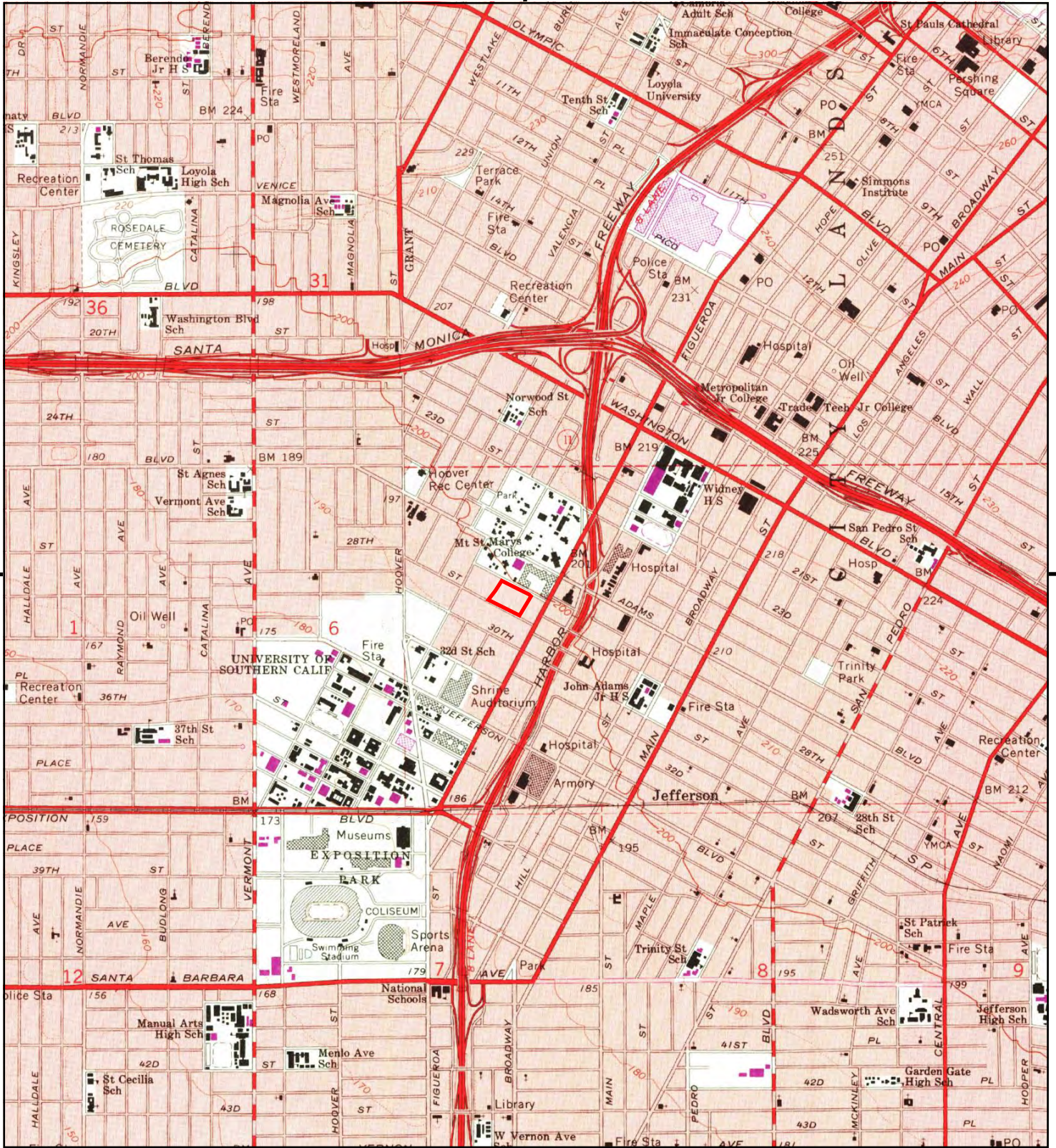
This report includes information from the following map sheet(s).



TP, Hollywood, 1981, 7.5-minute

SITE NAME: P1E-19-12-08
 ADDRESS: 2601 South Figueroa Street
 Los Angeles, CA 90007
 CLIENT: Priority One Environmental, Inc.





This report includes information from the following map sheet(s).

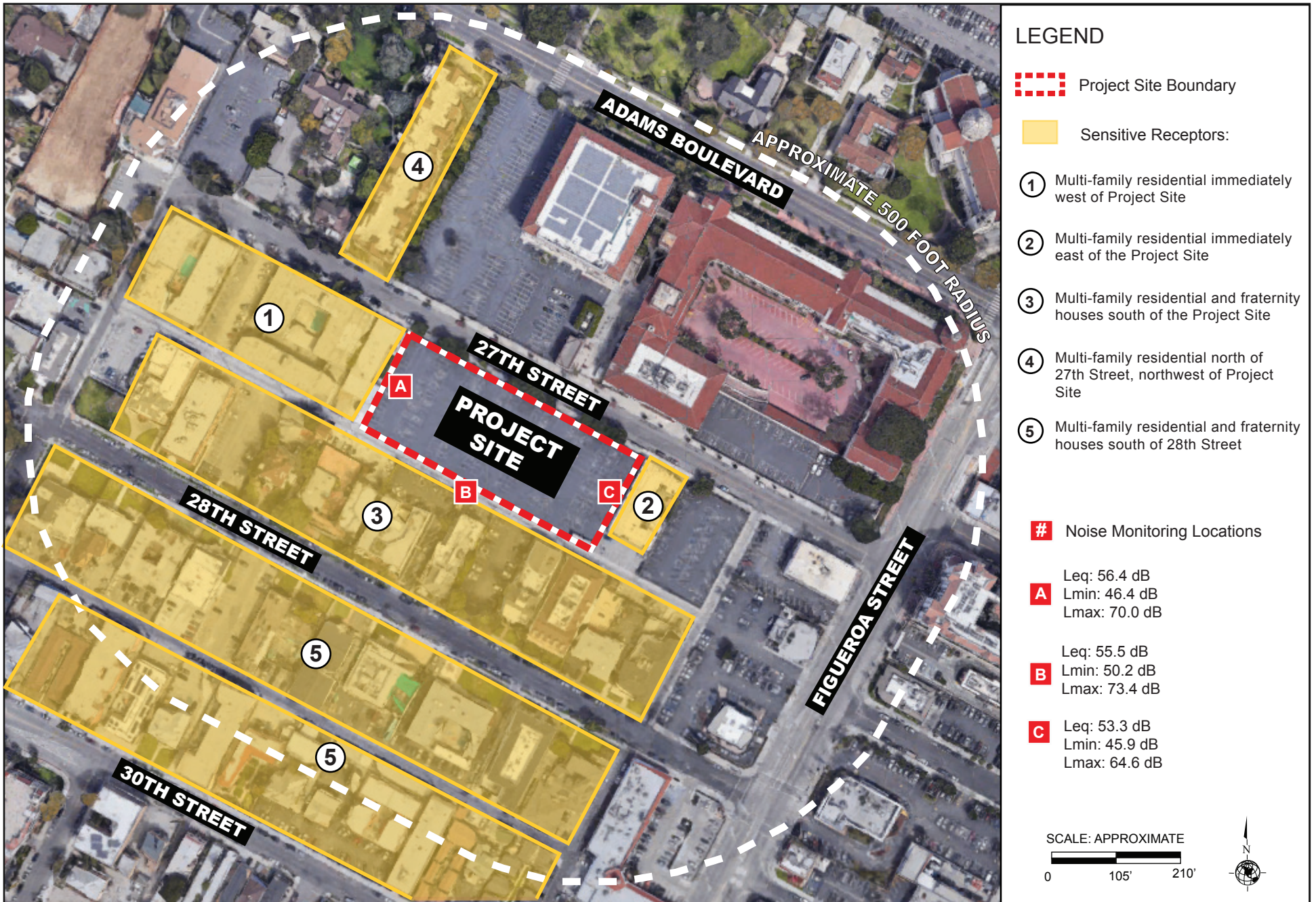


TP, Hollywood, 1972, 7.5-minute

SITE NAME: P1E-19-12-08
 ADDRESS: 2601 South Figueroa Street
 Los Angeles, CA 90007
 CLIENT: Priority One Environmental, Inc.



APPENDIX F: NOISE MONITORING DATA AND CALCULATION WORKSHEETS



Source: Google Earth, Aerial View, 2019.



Summary

File Name on Meter 831_Data.279
 Serial Number 0003748
 Model Model 831
 Firmware Version 2.311
 User Rachel Mills-Coyne
 Job Description SMRH AAA
 Location A: Inside the Project Site, along the side of the northwest section of the Project Site.
 Noise Sources: Occasional car parking, no pedestrian use, minimal vehicle use along 27th St. Peaks caused by cars parking near or passing noise instrument.



Measurement

Description
 Start 2020-02-13 10:31:00
 Stop 2020-02-13 10:46:00
 Duration 00:15:00.0
 Run Time 00:15:00.0
 Pause 00:00:00.0
 Pre Calibration 2020-02-13 09:38:10
 Post Calibration None
 Calibration Deviation ---

Overall Settings

RMS Weight A Weighting
 Peak Weight Z Weighting
 Detector Slow
 Preamp PRM831
 Microphone Correction Off
 Integration Method Linear
 Gain 0.0 dB
 Overload 142.3 dB

	A	C	Z
Under Range Peak	74.7	71.7	76.7 dB
Under Range Limit	26.0	26.2	31.4 dB
Noise Floor	16.9	17.0	22.1 dB

Results

LAeq 56.4 dB
 LAE 85.9 dB
 EA 43.441 $\mu\text{Pa}^2\text{h}$
 LZpeak (max) 2020-02-13 10:41:45 95.0 dB
 LASmax 2020-02-13 10:41:46 70.4 dB
 LASmin 2020-02-13 10:43:32 46.4 dB
 SEA -99.9 dB
 LAS > 65.0 dB (Exceedance Counts / Duration) 4 32.4 s
 LAS > 85.0 dB (Exceedance Counts / Duration) 0 0.0 s
 LZpeak > 135.0 dB (Exceedance Counts / Duration) 0 0.0 s
 LZpeak > 137.0 dB (Exceedance Counts / Duration) 0 0.0 s
 LZpeak > 140.0 dB (Exceedance Counts / Duration) 0 0.0 s

Community Noise	Ldn	LDay 07:00-22:00	Lden	LDay 07:00-19:00
	56.4	56.4	56.4	56.4
LCeq	66.8 dB			
LAeq	56.4 dB			
LCeq - LAeq	10.4 dB			
LAlaq	58.3 dB			
LAeq	56.4 dB			
LAlaq - LAeq	1.9 dB			

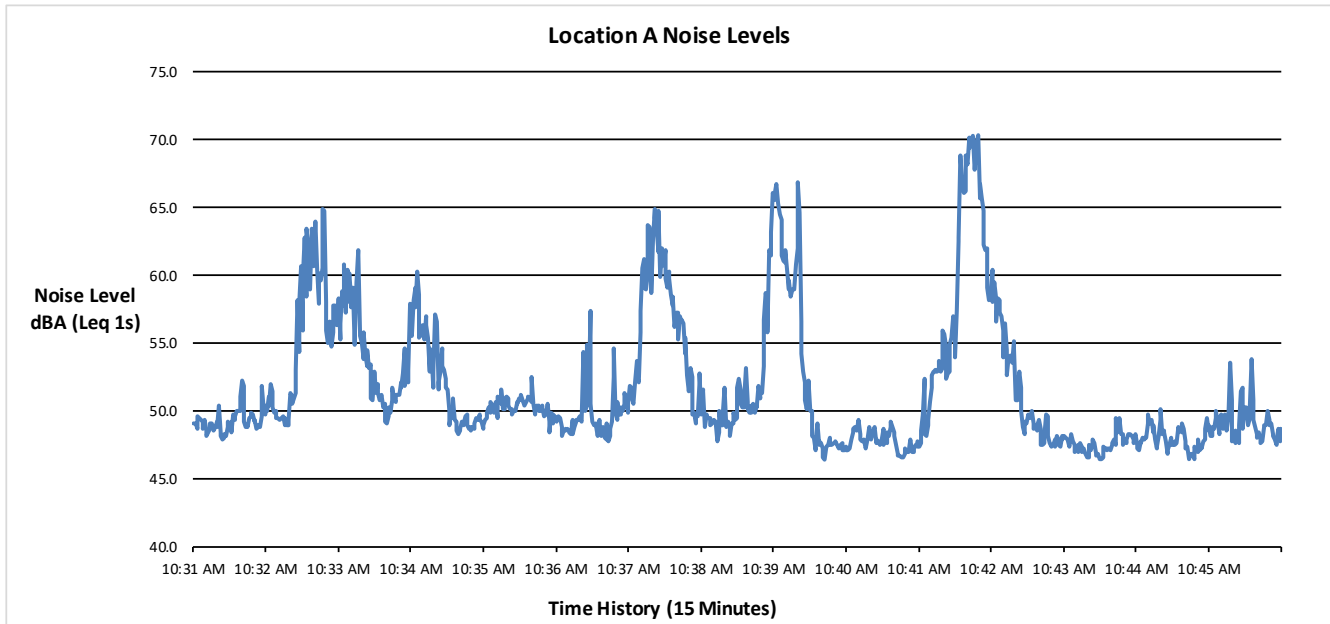
Leq
 LS(max)
 LF(max)
 LI(max)
 LS(min)
 LF(min)
 LI(min)
 LPeak(max)

A	
dB	Time Stamp
56.4	
70.4	2020/02/13 10:41:46
72.1	2020/02/13 10:41:46
73.6	2020/02/13 10:41:44
46.4	2020/02/13 10:43:32
45.8	2020/02/13 10:39:42
46.3	2020/02/13 10:44:44
86.5	2020/02/13 10:36:27

Overloads 0
 Overload Duration 0.0 s

Statistics

LAS5.00	62.6 dB
LAS10.00	59.7 dB
LAS33.30	51.3 dB
LAS50.00	49.7 dB
LAS66.60	48.9 dB
LAS90.00	47.6 dB



Summary

File Name on Meter 831_Data.280
Serial Number 0003748
Model Model 831
Firmware Version 2.311
User Rachel Mills-Coyne
Job Description SMRH AAA

Location B: Alley between 27th Street and 28th Street, located in the middle of the exterior southern boundary of the Project Site.

Noise Sources: Recycling truck passing through at the beginning, 3 cars passed through alley (source of peaks toward the end), no pedestrian activity, relatively quiet, some street noise from Figueroa.


Measurement

Description
Start 2020-02-13 10:56:08
Stop 2020-02-13 11:11:08
Duration 00:15:00.0
Run Time 00:15:00.0
Pause 00:00:00.0

Pre Calibration 2020-02-13 09:38:10
Post Calibration None
Calibration Deviation --

Overall Settings

RMS Weight	A Weighting		
Peak Weight	Z Weighting		
Detector	Slow		
Preamp	PRM831		
Microphone Correction	Off		
Integration Method	Linear		
Gain	0.0 dB		
Overload	142.3 dB		
	A	C	Z
Under Range Peak	74.7	71.7	76.7 dB
Under Range Limit	26.0	26.2	31.4 dB
Noise Floor	16.9	17.0	22.1 dB

Results

LAeq	55.5 dB	
LAE	85.1 dB	
EA	35.667 $\mu\text{Pa}^2\text{h}$	
LZpeak (max)	2020-02-13 11:10:35	95.7 dB
LASmax	2020-02-13 11:10:38	73.4 dB
LASmin	2020-02-13 11:01:38	50.2 dB
SEA	-99.9 dB	

LAS > 65.0 dB (Exceedance Counts / Duration)	2	12.6 s
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Community Noise	Ldn	LDay 07:00-22:00	Lden	LDay 07:00-19:00
	55.5	55.5	55.5	55.5
LCeq	68.4 dB			
LAeq	55.5 dB			
LCeq - LAeq	12.9 dB			
LALeq	57.7 dB			
LAeq	55.5 dB			
LALeq - LAeq	2.2 dB			

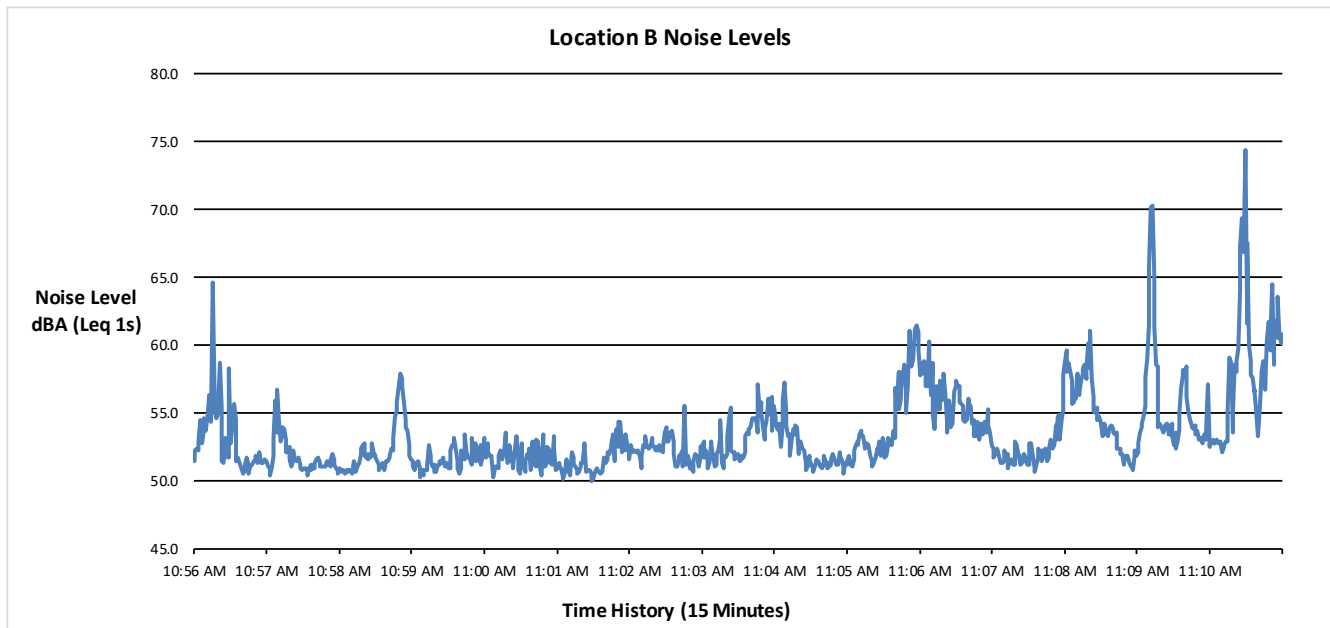
Leq
 LS(max)
 LF(max)
 LI(max)
 LS(min)
 LF(min)
 LI(min)
 LPeak(max)

A	
dB	Time Stamp
55.5	
73.4	2020/02/13 11:10:38
76.8	2020/02/13 11:10:38
77.6	2020/02/13 11:10:38
50.2	2020/02/13 11:01:38
49.6	2020/02/13 11:01:38
49.9	2020/02/13 11:01:38
87.6	2020/02/13 11:02:54

Overloads 0
 Overload Duration 0.0 s

Statistics

LAS5.00 59.2 dB
 LAS10.00 57.4 dB
 LAS33.30 53.5 dB
 LAS50.00 52.4 dB
 LAS66.60 51.8 dB
 LAS90.00 51.1 dB





Summary

File Name on Meter 831_Data.278
Serial Number 0003748
Model Model 831
Firmware Version 2.311
User Rachel Mills-Coyne
Job Description SMRH AAA
Location C: Inside the Project Site, along the side of the southeast section of the Project Site.
Noise Sources: Occasional car parking, no pedestrian use, minimal vehicle use along 27th St. Peaks caused by cars parking near or passing noise instrument.



Measurement

Description
Start 2020-02-13 10:11:19
Stop 2020-02-13 10:26:19
Duration 00:15:00.0
Run Time 00:15:00.0
Pause 00:00:00.0

Pre Calibration 2020-02-13 09:38:10
Post Calibration None
Calibration Deviation ---

Overall Settings

RMS Weight A Weighting
Peak Weight Z Weighting
Detector Slow
Preamp PRM831
Microphone Correction Off
Integration Method Linear
Gain 0.0 dB
Overload 142.3 dB

	A	C	Z
Under Range Peak	74.7	71.7	76.7 dB
Under Range Limit	26.0	26.2	31.4 dB
Noise Floor	16.9	17.0	22.1 dB

Results

LAeq 53.3 dB
LAE 82.8 dB
EA 21.408 µPa²h
LZpeak (max) 2020-02-13 10:24:56 91.7 dB
LASmax 2020-02-13 10:16:57 64.6 dB
LASmin 2020-02-13 10:22:55 45.9 dB
SEA -99.9 dB

LAS > 65.0 dB (Exceedance Counts / Duration) 0 0.0 s
LAS > 85.0 dB (Exceedance Counts / Duration) 0 0.0 s
LZpeak > 135.0 dB (Exceedance Counts / Duration) 0 0.0 s
LZpeak > 137.0 dB (Exceedance Counts / Duration) 0 0.0 s
LZpeak > 140.0 dB (Exceedance Counts / Duration) 0 0.0 s

Community Noise	Ldn	LDay 07:00-22:00	Lden	LDay 07:00-19:00
	53.3	53.3	53.3	53.3
LCeq	66.8 dB			
LAeq	53.3 dB			
LCeq - LAeq	13.5 dB			
LAlaq	55.1 dB			
LAeq	53.3 dB			
LAlaq - LAeq	1.8 dB			

	A	
	dB	Time Stamp
Leq	53.3	
LS(max)	64.6	2020/02/13 10:16:57
LF(max)	67.2	2020/02/13 10:16:54
LI(max)	68.2	2020/02/13 10:16:56
LS(min)	45.9	2020/02/13 10:22:55
LF(min)	45.4	2020/02/13 10:24:41
LI(min)	45.9	2020/02/13 10:22:55
LPeak(max)	80.2	2020/02/13 10:15:26

Overloads 0
 Overload Duration 0.0 s

Statistics

LAS5.00	59.8 dB
LAS10.00	57.9 dB
LAS33.30	50.6 dB
LAS50.00	49.2 dB
LAS66.60	48.4 dB
LAS90.00	47.0 dB

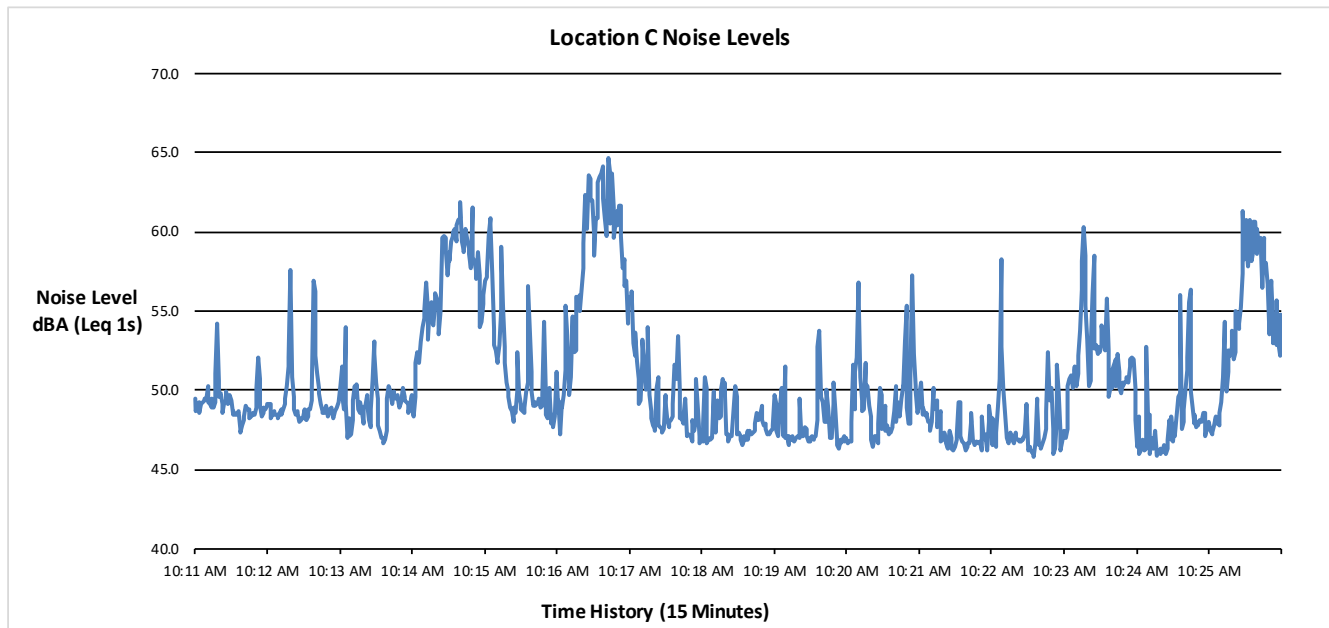


Table 1. CA/T equipment noise emissions and acoustical usage factors database.

CA/T Noise Emission Reference Levels and Usage Factors					
filename: EQUIPLST.xls					
revised: 7/26/05					
	Impact	Acoustical Use Factor	Spec 721.560 Lmax @ 50ft	Actual Measured Lmax @ 50ft	No. of Actual Data Samples
Equipment Description	Device ?	(%)	(dBA, slow)	(dBA, slow)	(Count)
				(samples averaged)	
All Other Equipment > 5 HP	No	50	85	-- N/A --	0
Auger Drill Rig	No	20	85	84	36
Backhoe	No	40	80	78	372
Bar Bender	No	20	80	-- N/A --	0
Blasting	Yes	-- N/A --	94	-- N/A --	0
Boring Jack Power Unit	No	50	80	83	1
Chain Saw	No	20	85	84	46
Clam Shovel (dropping)	Yes	20	93	87	4
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Batch Plant	No	15	83	-- N/A --	0
Concrete Mixer Truck	No	40	85	79	40
Concrete Pump Truck	No	20	82	81	30
Concrete Saw	No	20	90	90	55
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Drill Rig Truck	No	20	84	79	22
Drum Mixer	No	50	80	80	1
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flat Bed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (<25KVA, VMS signs)	No	50	70	73	74
Gradall	No	40	85	83	70
Grader	No	40	85	-- N/A --	0
Grapple (on backhoe)	No	40	85	87	1
Horizontal Boring Hydr. Jack	No	25	80	82	6
Hydra Break Ram	Yes	10	90	-- N/A --	0
Impact Pile Driver	Yes	20	95	101	11
Jackhammer	Yes	20	85	89	133
Man Lift	No	20	85	75	23
Mounted Impact Hammer (hoe ram)	Yes	20	90	90	212
Pavement Scarafier	No	20	85	90	2
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rivit Buster/chipping gun	Yes	20	85	79	19
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (Single Nozzle)	No	20	85	96	9
Scraper	No	40	85	84	12
Shears (on backhoe)	No	40	85	96	5
Slurry Plant	No	100	78	78	1
Slurry Trenching Machine	No	50	82	80	75
Soil Mix Drill Rig	No	50	80	-- N/A --	0
Tractor	No	40	84	-- N/A --	0
Vacuum Excavator (Vac-truck)	No	40	85	85	149
Vacuum Street Sweeper	No	10	80	82	19
Ventilation Fan	No	100	85	79	13
Vibrating Hopper	No	50	85	87	1
Vibratory Concrete Mixer	No	20	80	80	1
Vibratory Pile Driver	No	20	95	101	44
Warning Horn	No	5	85	83	12
Welder / Torch	No	40	73	74	5

Construction Noise Impact Summary Without Mitigation

Address	Ambient Noise (dBA Leq)	Noise Level Impact (dBA Leq) by Phase					Construction Noise Threshold (dBA Leq)**	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating	Paving		
RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)	56.40	72.2	71.5	67.2	66.0	65.1	61.4	10.8
RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)	53.30	72.2	71.5	67.2	66.0	65.1	58.3	13.9
RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)	55.50	77.8	77.1	72.8	71.6	70.7	60.5	17.3
RECEPTOR #4 [Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments)]	56.40	68.6	68.0	63.6	62.4	61.6	61.4	7.2
RECEPTOR #5 [Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street]	55.50	57.8	57.2	61.7	51.6	50.8	60.5	1.2

** Significance criteria is based on a 5- dBA noise increase above ambient threshold .

Construction Noise Impact Summary With Mitigation

Address	Ambient Noise (dBA Leq)	Noise Level Impact (dBA Leq) by Phase					Construction Noise Threshold (dBA Leq)**	Noise Impact Above Threshold
		Demo	Grading	Building	Architectural Coating	Paving		
RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)	56.40	53.1	51.5	47.2	46.0	45.1	61.4	0.0
RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)	53.30	53.1	51.5	47.2	46.0	45.1	58.3	0.0
RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)	55.50	58.7	57.1	52.8	51.6	50.7	60.5	0.0
RECEPTOR #4 [Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments)]	56.40	49.6	48.0	43.6	42.4	41.6	61.4	0.0
RECEPTOR #5 [Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street]	55.50	48.7	47.2	42.8	41.6	40.8	60.5	0.0

** Significance criteria is based on a 5- dBA noise increase above ambient threshold .

Report date: 5/1/20
 Project: AAA Parking Structure
 Phase: Demolition / Site Clearing

RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Concrete/Industrial Saw	No	20	90	90	10	200	0	78.0	71.0	20	58.0	51.0
Dozer	No	40	85	82	10	200	0	70.0	66.0	20	53.0	49.0
							Construction Noise Level (dBA Leq)			Results		
							72.2			53.1		
							Noise Level Above Ambient			Noise Level Above Ambient		
							15.8			-3.3		

RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	53.3										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Concrete/Industrial Saw	No	20	90	90	10	200	0	78.0	71.0	20	58.0	51.0
Dozer	No	40	85	82	10	200	0	70.0	66.0	20	53.0	49.0
							Construction Noise Level (dBA Leq)			Results		
							72.2			53.1		
							Noise Level Above Ambient			Noise Level Above Ambient		
							18.9			-0.2		

RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Concrete/Industrial Saw	No	20	90	90	20	105	0	83.6	76.6	20	63.6	56.6
Dozer	No	40	85	82	20	105	0	75.6	71.6	20	58.6	54.6
							Construction Noise Level (dBA Leq)			Results		
							77.8			58.7		
							Noise Level Above Ambient			Noise Level Above Ambient		
							22.3			3.2		

RECEPTOR #4 (Multi-Family Residences at 718 W. Adams Blvd. (USC Annengerg House Apartments))												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Concrete/Industrial Saw	No	20	90	90	95	300	0	74.4	67.4	20	54.4	47.4
Dozer	No	40	85	82	95	300	0	66.4	62.5	20	49.4	45.5
							Construction Noise Level (dBA Leq)			Results		
							68.6			49.6		
							Noise Level Above Ambient			Noise Level Above Ambient		
							12.2			-6.8		

RECEPTOR #5 (Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Concrete/Industrial Saw	No	20	90	90	225	330	10	63.6	56.6	20	53.6	46.6
Dozer	No	40	85	82	225	330	10	55.6	51.6	20	48.6	44.6
							Construction Noise Level (dBA Leq)			Results		
							57.8			48.7		
							Noise Level Above Ambient			Noise Level Above Ambient		
							2.3			-6.8		

- Notes:**
- Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 - An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 - Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 5/1/20
 Project: AAA Parking Structure
 Phase: Grading

RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Grader	No	40	85	NA	10	200	0	73.0	69.0	20	53.0	49.0
Tractor/Backhoe	No	40	84		10	200	0	72.0	68.0	20	52.0	48.0
							Construction Noise Level (dBA Leq)			Results		
							71.5			51.5		
							Noise Level Above Ambient			Noise Level Above Ambient		
							15.1			-4.9		

RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	53.3										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Grader	No	40	85	NA	10	200	0	73.0	69.0	20	53.0	49.0
Tractor/Backhoe	No	40	84		10	200	0	72.0	68.0	20	52.0	48.0
							Construction Noise Level (dBA Leq)			Results		
							71.5			51.5		
							Noise Level Above Ambient			Noise Level Above Ambient		
							18.2			-1.8		

RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Grader	No	40	85	NA	20	105	0	78.6	74.6	20	58.6	54.6
Tractor/Backhoe	No	40	84		20	105	0	77.6	73.6	20	57.6	53.6
							Construction Noise Level (dBA Leq)			Results		
							77.1			57.1		
							Noise Level Above Ambient			Noise Level Above Ambient		
							21.6			1.6		

RECEPTOR #4 (Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments))												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Grader	No	40	85	NA	95	300	0	69.4	65.5	20	49.4	45.5
Tractor/Backhoe	No	40	84		95	300	0	68.4	64.5	20	48.4	44.5
							Construction Noise Level (dBA Leq)			Results		
							68.0			48.0		
							Noise Level Above Ambient			Noise Level Above Ambient		
							11.6			-8.4		

RECEPTOR #5 (Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding	Calculated (dBA)		Estimated Shielding	Calculated (dBA)	
							(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Grader	No	40	85	NA	225	330	10	58.6	54.6	20	48.6	44.6
Tractor/Backhoe	No	40	84		225	330	10	57.6	53.6	20	47.6	43.6
							Construction Noise Level (dBA Leq)			Results		
							57.2			47.2		
							Noise Level Above Ambient			Noise Level Above Ambient		
							1.7			-8.3		

- Notes:**
- Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 - An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 - Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 5/1/20
 Project: AAA Parking Structure
 Phase: Building Construction

RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation		With Mitigation			
Crane	No	16	85	81	10	200	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Generator	No	50	82	81	10	200	Shielding (dBA)	*Lmax	Leq	Shielding (dBA)	*Lmax	Leq
							0	69.0	61.0	20	49.0	41.0
							0	69.0	65.9	20	49.0	45.9
Construction Noise Level (dBA Leq)								67.2	Results			47.2
Noise Level Above Ambient								10.8	Noise Level Above Ambient			-9.2

RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	53.3										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation		With Mitigation			
Crane	No	16	85	81	10	200	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Generator	No	50	82	81	10	200	Shielding (dBA)	*Lmax	Leq	Shielding (dBA)	*Lmax	Leq
							0	69.0	61.0	20	49.0	41.0
							0	69.0	65.9	20	49.0	45.9
Construction Noise Level (dBA Leq)								67.2	Results			47.2
Noise Level Above Ambient								13.9	Noise Level Above Ambient			-6.1

RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Without Mitigation		With Mitigation			
Crane	No	16	85	81	20	105	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Generator	No	50	82	81	20	105	Shielding (dBA)	*Lmax	Leq	Shielding (dBA)	*Lmax	Leq
							0	74.6	66.6	20	54.6	46.6
							0	74.6	71.5	20	54.6	51.5
Construction Noise Level (dBA Leq)								72.8	Results			52.8
Noise Level Above Ambient								17.3	Noise Level Above Ambient			-2.7

RECEPTOR #4 [Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments)]												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Without Mitigation		With Mitigation			
Crane	No	16	85	81	95	300	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Generator	No	50	82	81	95	300	Shielding (dBA)	*Lmax	Leq	Shielding (dBA)	*Lmax	Leq
							0	65.4	57.5	20	45.4	37.5
							0	65.4	62.4	20	45.4	42.4
Construction Noise Level (dBA Leq)								63.6	Results			43.6
Noise Level Above Ambient								7.2	Noise Level Above Ambient			-12.8

RECEPTOR #5 [Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street]												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation		With Mitigation			
Crane	No	16	85	81	225	330	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Generator	No	50	82	81	225	330	Shielding (dBA)	*Lmax	Leq	Shielding (dBA)	*Lmax	Leq
							10	54.6	46.7	20	44.6	36.7
							0	64.6	61.6	20	44.6	41.6
Construction Noise Level (dBA Leq)								61.7	Results			42.8
Noise Level Above Ambient								6.2	Noise Level Above Ambient			-12.7

- Notes:**
- Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 - An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 - Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM), Version 1.1



Report date: 5/1/20
 Project: AAA Parking Structure
 Phase: Architectural Coating

RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)												
Ambient/Baseline (dBA)												
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Air Compressor	No	50	80	78	10	200	(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Air Compressor	No	50	80	78	10	200	0	66.0	62.9	20	46.0	42.9
							0	66.0	62.9	20	46.0	42.9
							Construction Noise Level (dBA Leq) 66.0			Results 46.0		
							Noise Level Above Ambient 9.6			Noise Level Above Ambient -10.4		

RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)												
Ambient/Baseline (dBA)												
Description	Land Use	Daytime										
Residences west of Project Site	Residential	53.3										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Air Compressor	No	50	80	78	10	200	(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Air Compressor	No	50	80	78	10	200	0	66.0	62.9	20	46.0	42.9
							0	66.0	62.9	20	46.0	42.9
							Construction Noise Level (dBA Leq) 66.0			Results 46.0		
							Noise Level Above Ambient 12.7			Noise Level Above Ambient -7.3		

RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)												
Ambient/Baseline (dBA)												
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Air Compressor	No	50	80	78	20	105	(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Air Compressor	No	50	80	78	20	105	0	71.6	68.5	20	51.6	48.5
							0	71.6	68.5	20	51.6	48.5
							Construction Noise Level (dBA Leq) 71.6			Results 51.6		
							Noise Level Above Ambient 16.1			Noise Level Above Ambient -3.9		

RECEPTOR #4 (Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments))												
Ambient/Baseline (dBA)												
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Air Compressor	No	50	80	78	95	300	(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Air Compressor	No	50	80	78	95	300	0	62.4	59.4	20	42.4	39.4
							0	62.4	59.4	20	42.4	39.4
							Construction Noise Level (dBA Leq) 62.4			Results 42.4		
							Noise Level Above Ambient 6.0			Noise Level Above Ambient -14.0		

RECEPTOR #5 (Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street)												
Ambient/Baseline (dBA)												
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment							Without Mitigation			With Mitigation		
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Air Compressor	No	50	80	78	225	330	(dBA)	*Lmax	Leq	(dBA)	*Lmax	Leq
Air Compressor	No	50	80	78	225	330	10	51.6	48.6	20	41.6	38.6
							10	51.6	48.6	20	41.6	38.6
							Construction Noise Level (dBA Leq) 51.6			Results 41.6		
							Noise Level Above Ambient -3.9			Noise Level Above Ambient -13.9		

- Notes:
- Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
 - An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
 - Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 5/1/20
 Project: AAA Parking Structure
 Phase: Paving

RECEPTOR #1 (Multi-Family Residences (Nucap Apartments) at 710 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation			With Mitigation		
							Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Cement Mixer Truck	No	40	85	79	10	200	0	*Lmax 67.0	Leq 63.0	20	*Lmax 47.0	Leq 43.0
Roller	No	20	85	80	10	200	0	68.0	61.0	20	48.0	41.0
							Construction Noise Level (dBA Leq)			Results		
							65.1			45.1		
							Noise Level Above Ambient			-8.7		
							8.7			-11.3		

RECEPTOR #2 (Multi-Family Residences (Stardust Apartments) at 634 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	53.3										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation			With Mitigation		
							Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Cement Mixer Truck	No	40	85	79	10	200	0	*Lmax 67.0	Leq 63.0	20	*Lmax 47.0	Leq 43.0
Roller	No	20	85	80	10	200	0	68.0	61.0	20	48.0	41.0
							Construction Noise Level (dBA Leq)			Results		
							65.1			45.1		
							Noise Level Above Ambient			11.8		
							11.8			-8.2		

RECEPTOR #3 (Multi-Family Residences at 737 - 635 W. 27th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Without Mitigation			With Mitigation		
							Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Cement Mixer Truck	No	40	85	79	20	105	0	*Lmax 72.6	Leq 68.6	20	*Lmax 52.6	Leq 48.6
Roller	No	20	85	80	20	105	0	73.6	66.6	20	53.6	46.6
							Construction Noise Level (dBA Leq)			Results		
							70.7			50.7		
							Noise Level Above Ambient			15.2		
							15.2			-4.8		

RECEPTOR #4 (Multi-Family Residences at 718 W. Adams Blvd. (USC Annenberg House Apartments))												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	56.4										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Distance to Centerline of Project Site (Feet)	Without Mitigation			With Mitigation		
							Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Cement Mixer Truck	No	40	85	79	95	300	0	*Lmax 63.4	Leq 59.5	20	*Lmax 43.4	Leq 39.5
Roller	No	20	85	80	95	300	0	64.4	57.4	20	44.4	37.4
							Construction Noise Level (dBA Leq)			Results		
							61.6			41.6		
							Noise Level Above Ambient			5.2		
							5.2			-14.8		

RECEPTOR #5 (Multi-family Residences at 724 - 626 W. 28th Street and 817-619 W. 30th Street)												
		Ambient/Baseline (dBA)										
Description	Land Use	Daytime										
Residences west of Project Site	Residential	55.5										
Equipment												
Description	Impact Device	Usage(%)	Spec. Max (dBA)	Actual Max (dBA)	Receptor Distance to Project Site (Feet)	Receptor Distance to Centerline of Project Site (Feet)	Without Mitigation			With Mitigation		
							Estimated Shielding (dBA)	Calculated (dBA)		Estimated Shielding (dBA)	Calculated (dBA)	
Cement Mixer Truck	No	40	85	79	255	330	10	*Lmax 52.6	Leq 48.6	20	*Lmax 42.6	Leq 38.6
Roller	No	20	85	80	255	330	10	53.6	46.6	20	43.6	36.6
							Construction Noise Level (dBA Leq)			Results		
							50.8			40.8		
							Noise Level Above Ambient			-4.7		
							-4.7			-14.7		

Notes:

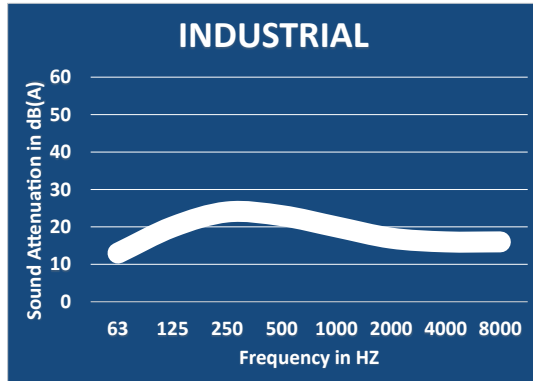
- Daytime noise levels are based on actual noise measurements taken at the Project Site vicinity.
- An attenuation factor of 10 dBA was applied for sensitive receptors where buildings separate the Project Site and the associated sensitive receptor.
- Calculations based on the loudest two pieces of heavy construction equipment specific to each phase.

Source: Roadway Construction Noise Model (RCNM), Version 1.1

Industrial Grade Silencers

Model NTIN-C (Cylindrical), 15-20 dBA

TYPICAL ATTENUATION CURVE



Nett Technologies' Industrial Grade Silencers are designed to achieve maximum performance with the least amount of backpressure. The silencers are Reactive Silencers and are typically used for reciprocating or positive displacement engines where noise level regulations are low.

FEATURES & BENEFITS

- Over 25 years of excellence in manufacturing noise and emission control solutions
- Compact modular designs providing ease of installations, less weight and less foot-print
- Responsive lead time for both standard and custom designs to meet your needs
- Customized engineered systems solutions to meet challenging integration and engine requirements

Contact Nett Technologies with your projects design requirements and specifications for optimized noise control solutions.

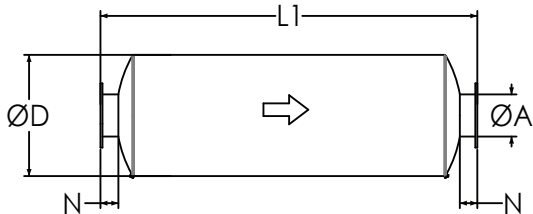
OPTIONS

- Versatile connections including ANSI pattern flanges, NPT, slip-on, engine flange, schedule 40 and others
- Aluminized Steel, Stainless Steel 304 or 316 construction
- Horizontal or vertical mounting brackets and lifting lugs

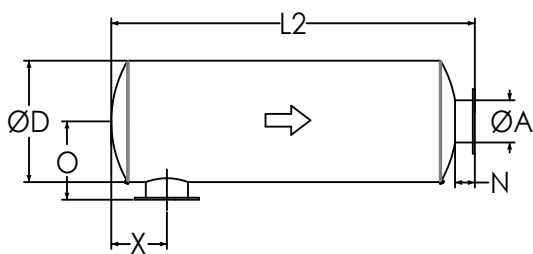
ACCESSORIES

- Hardware Kits
- Flexible connectors and expansion joints
- Elbows
- Thimbles
- Raincaps
- Thermal insulation: integrated or with thermal insulation blankets
- Please see our accessories catalog for a complete listing

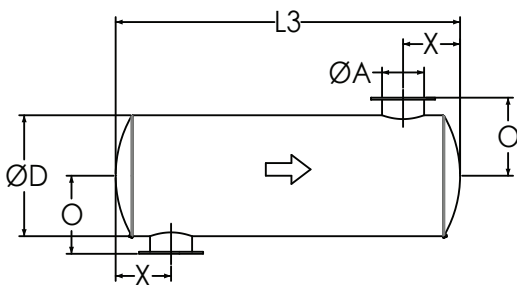
TYPICAL CONFIGURATIONS



END IN END OUT (EI-EO)



SIDE IN END OUT (SI-EO)



SIDE IN SIDE OUT (SI-SO)

PRODUCT DIMENSIONS (in)

Model*	A	D	L1	L2	L3	X**	X	N	O
	Outlet	Dia	EI-EO	SI-EO	SI-SO	Min	Max	Nipple	O
NTIN-C1	1	4	20	18	16	3	7	2	4
NTIN-C1.5	1.5	6	22	20	18	3	8	2	5
NTIN-C2	2	6	22	19	16	3	8	3	6
NTIN-C2.5	2.5	6	24	21	18	4	9	3	6
NTIN-C3	3	8	26	23	20	5	10	3	7
NTIN-C3.5	3.5	9	28	25	22	5	11	3	8
NTIN-C4	4	10	32	29	26	5	12	3	8
NTIN-C5	5	12	36	33	30	6	14	3	9
NTIN-C6	6	14	40	36	32	7	16	4	11
NTIN-C8	8	16	50	46	42	8	21	4	12
NTIN-C10	10	20	52	48	44	11	21	4	14
NTIN-C12	12	24	62	58	54	12	26	4	16
NTIN-C14	14	30	74	69	64	15	31	5	20
NTIN-C16	16	36	82	77	72	18	35	5	23
NTIN-C18	18	40	94	89	84	18	42	5	25
NTIN-C20	20	40	110	105	100	19	52	5	25
NTIN-C22	22	48	118	113	108	22	56	5	29
NTIN-C24	24	48	130	125	120	24	62	5	29

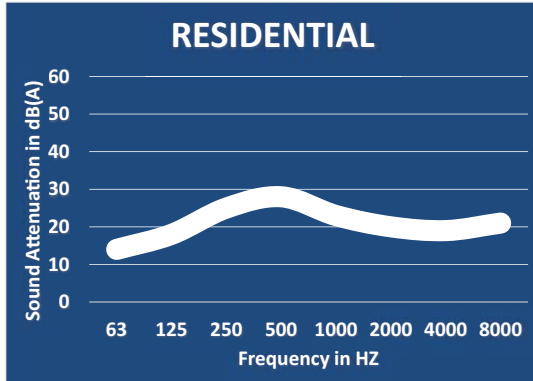
* Other models and custom designs are available upon request. Dimensions subject to change without notice. All silencers are equipped with drain ports on inlet side. The silencer is all welded construction and coated with high heat black paint for maximum durability.

** Standard inlet/outlet position.

Residential Grade Silencers

Model NTRS-C (Cylindrical), 20-25 dBA

TYPICAL ATTENUATION CURVE



Nett Technologies' Residential Grade Silencers are designed to achieve maximum performance with the least amount of backpressure. The silencers are Reactive Silencers and are typically used for reciprocating or positive displacement engines where noise level regulations are medium-low.

FEATURES & BENEFITS

- Over 25 years of excellence in manufacturing noise and emission control solutions
- Compact modular designs providing ease of installations, less weight and less foot-print
- Responsive lead time for both standard and custom designs to meet your needs
- Customized engineered systems solutions to meet challenging integration and engine requirements

Contact Nett Technologies with your projects design requirements and specifications for optimized noise control solutions.

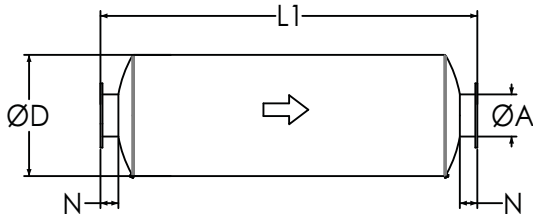
OPTIONS

- Versatile connections including ANSI pattern flanges, NPT, slip-on, engine flange, schedule 40 and others
- Aluminized Steel, Stainless Steel 304 or 316 construction
- Horizontal or vertical mounting brackets and lifting lugs

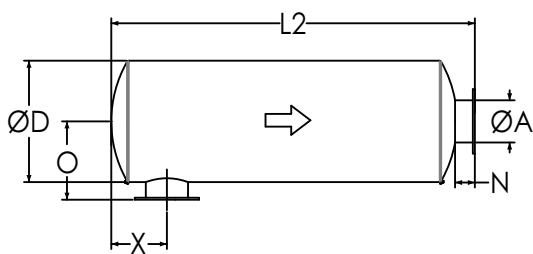
ACCESSORIES

- Hardware Kits
- Flexible connectors and expansion joints
- Elbows
- Thimbles
- Raincaps
- Thermal insulation: integrated or with thermal insulation blankets
- Please see our accessories catalog for a complete listing

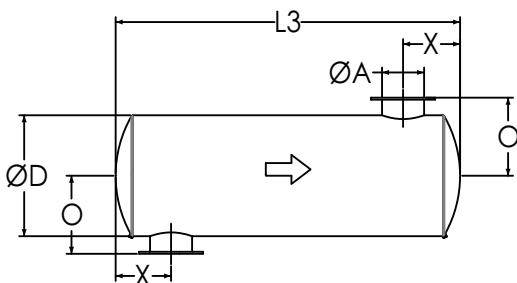
TYPICAL CONFIGURATIONS



END IN END OUT (EI-EO)



SIDE IN END OUT (SI-EO)



SIDE IN SIDE OUT (SI-SO)

PRODUCT DIMENSIONS (in)

Model*	A	D	L1	L2	L3	X**	X	N	O
	Outlet	Dia	EI-EO	SI-EO	SI-SO	Min	Max	Nipple	O
NTRS-C1	1	4	20	18	16	3	10	2	4
NTRS-C1.5	1.5	6	28	26	24	3	12	2	5
NTRS-C2	2	6	28	25	22	4	12	3	6
NTRS-C2.5	2.5	6	32	29	26	4	14	3	6
NTRS-C3	3	6	34	31	28	5	15	3	6
NTRS-C3.5	3.5	9	36	33	30	5	16	3	8
NTRS-C4	4	10	40	37	34	5	17	3	8
NTRS-C5	5	12	42	39	36	6	18	3	9
NTRS-C6	6	14	44	40	36	7	19	4	11
NTRS-C8	8	16	56	52	48	9	24	4	12
NTRS-C10	10	20	58	54	50	11	24	4	14
NTRS-C12	12	24	70	66	62	13	31	4	16
NTRS-C14	14	30	80	75	70	17	35	5	20
NTRS-C16	16	36	90	85	80	17	40	5	23
NTRS-C18	18	40	102	97	92	18	47	5	25
NTRS-C20	20	42	108	103	98	21	50	5	26
NTRS-C22	22	48	116	111	106	23	54	5	29
NTRS-C24	24	48	130	125	120	26	61	5	29

* Other models and custom designs are available upon request. Dimensions subject to change without notice. All silencers are equipped with drain ports on inlet side. The silencer is all welded construction and coated with high heat black paint for maximum durability.

** Standard inlet/outlet position.



Acoustical Surfaces, Inc.

SOUNDPROOFING, ACOUSTICS, NOISE & VIBRATION CONTROL SPECIALISTS

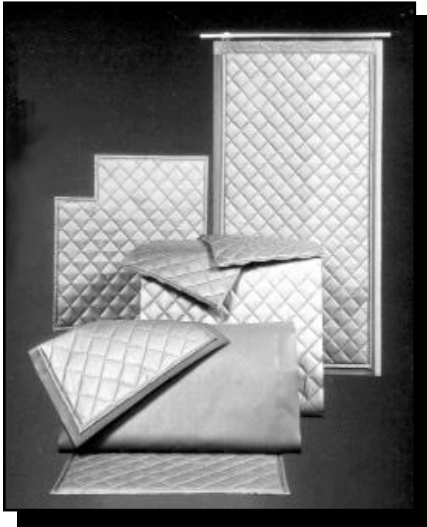
123 Columbia Court North • Suite 201 • Chaska, MN 55318

(952) 448-5300 • Fax (952) 448-2613 • (800) 448-0121

Email: sales@acousticalsurfaces.com

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We Identify and S.T.O.P. Your Noise Problems



QUILTED CURTAIN S.T.O.P.

Absorptive/Noise Barrier Quilted Curtains

- **For Unusual Conditions**
- **Cost Effective**
- **Water & Chemical Resistant**
- **Exterior Applications**

MATERIAL: Foam or fiberglass core, faced with quilted aluminized fabric.

PATTERN: Quilted pattern.

FEATURES: Effective and durable absorber with mass loaded vinyl barrier option.

APPLICATIONS: Effective solution to a wide range of noise control problems. Machinery and work area enclosures.

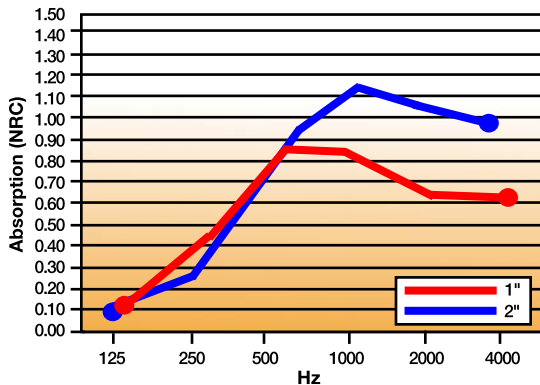
THICKNESS: 1" & 2".

NOM SIZES: BSC-25 Curtain (Quilting on both sides) standard: 48" wide and Lengths up to 25'.
BBC-13 Curtain (Quilting on one side) standard: 54" wide and Lengths up to 25'. Custom sizes also available.

COLOR: Silver (Other colors available upon request).

FLAMMABILITY: ASTM E-84, Class A. Flame Spread: 23, Smoke Developed: 30.

INSTALLATION: Hook and loop fasteners, grommet hangers, curtain support hardware.



CURTAIN S.T.O.P. Sound Transmission Loss - ASTM E90							
Frequency	125Hz	250Hz	500Hz	1KHz	2KHz	4KHz	STC
BSC-25 w/ 1 lb. Barrier	12	10	27	40	44	43	29
BSC-25 w/ 2 lb. Barrier	19	22	28	40	56	61	33
BBC-13 w/ 1 lb. Barrier	11	10	24	30	35	35	27
BBC-13 w/ 2 lb. Barrier	19	22	28	40	56	61	33

/a/
/b/

CURTAIN S.T.O.P. Sound Absorption Coefficients							
Frequency	125Hz	250Hz	500Hz	1KHz	2KHz	4KHz	NRC
1" Fiberglass	.12	.47	.85	.84	.64	.62	.70
2" Fiberglass	.19	.99	.96	.80	.57	.33	.85

/a/ Sound transmission loss is the decibel reduction achieved at different frequencies. Construction noise occurs throughout the frequency spectrum. An example of high frequency noise is the whining sound from a concrete saw or jackhammering, low frequency noise can be usually attributed to equipment such as the humming of a generator.

/b/ Sound Transmission Class (STC) is the integer rating of how well a material attenuates airborne sound. It is however a rough idea of sound reduction versus the transmission loss calculated at different frequencies.

- Soundproofing Products • Sonex™ Ceiling & Wall Panels • Sound Control Curtains • Equipment Enclosures • Acoustical Baffles & Banners • Solid Wood & Veneer Acoustical Ceiling & Wall Systems
- Professional Audio Acoustics • Vibration & Damping Control • Fire Retardant Acoustics • Hearing Protection • Moisture & Impact Resistant Products • Floor Impact Noise Reduction
- Sound Absorbers • Noise Barriers • Fabric Wrapped Wall Panels • Acoustical Foam (Egg Crate) • Acoustical Sealants & Adhesives • Outdoor Noise Control • Assistive Listening Devices
- OSHA, FDA, ADA Compliance • On-Site Acoustical Analysis • Acoustical Design & Consulting • Large Inventory • Fast Shipment • No Project too Large or Small • Major Credit Cards Accepted



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Echo Barrier™

**The Industry's First Reusable, Indoor/
Outdoor Noise Barrier/Absorber**

- Superior acoustic performance
- Industrial durability
- Simple and quick installation system
- Lightweight for easy handling
- Unique roll-up design for compact storage and transportation
- Double or triple up for noise 'hot spots'
- Ability to add branding or messages
- Range of accessories available
- Weatherproof – absorbs sound but not water
- Fire retardant
- 1 person can do the job of 2 or 3 people



Why is it all too often we see construction sites with fencing but no regard for sound issues created from the construction that is taking place? This is due to the fact that there has not been an efficient means of treating this type of noise that was cost effective **until now**.

Echo Barrier temporary fencing is a reusable, outdoor noise barrier. Designed to fit on all types of temporary fencing. Echo Barrier absorbs sound while remaining quick to install, light to carry and tough to last.

BENEFITS: Echo Barrier can help reduce noise complaints, enhance your company reputation, extend site operating hours, reduce project timescales & costs, and improve working conditions.

APPLICATIONS: Echo Barrier works great for construction & demolition sites; rail maintenance & replacement; music, sports and other public events; road construction; utility/maintenance sites; loading and unloading areas; outdoor gun ranges.

DIMENSIONS: 6.56' × 4.49'.

WEIGHT: 13 lbs.

ACOUSTIC PERFORMANCE: 10-20dB noise reduction (greater if barrier is doubled up).

INSTALLATION: The Echo Barrier is easily installed using our quick hook system and specially designed elastic ties.

Echo Barrier Transmission Loss Field Data							
	125Hz	250Hz	500Hz	1KHz	2KHz	4KHz	8KHz
Single Layer	6	12	16	23	28	30	30
Double Layer	7	19	24	28	32	31	32

APPENDIX G: TRANSPORTATION

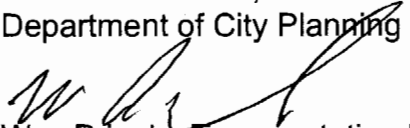
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CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

640 W. 27th St
DOT Case No. CEN 20-49957

Date: August 5, 2020

To: Milena Zasadzien, Senior City Planner
Department of City Planning

From: 
Wes Pringle, Transportation Engineer
Department of Transportation

**Subject: PARKING LOT ACCESS AND CIRCULATION TRANSPORTATION
STUDY FOR THE PROJECT AT 640 WEST 27TH STREET**

The Department of Transportation (DOT) has reviewed the parking and circulation transportation study submitted in the form of a technical memorandum, prepared by Gibson Transportation Consulting, dated June 8, 2020, for the proposed parking structure located at 640 West 27th Street. In compliance with SB 743 and the CEQA guidelines, a Vehicle Miles Traveled (VMT) analysis is required to identify the project's ability to promote the reduction of green-house gas emissions, the access to diverse land uses, and the development of multi-modal networks. The significance of a project's impact in this regard is measured against the VMT thresholds established in LADOT's July 2019 Transportation Assessment Guidelines (TAG). The assessment determined that the project would not be subject to a VMT analysis nor have any impacts related to VMT. Additionally, the project will not substantially increasing hazards due to a geometric design features or incompatible uses. DOT concurs with the conclusions of the analysis.

The project would construct a four and a half-story parking structure with up to 750 vehicle spaces to accommodate the existing and future parking demand of the AAA Headquarters located north of the project. The existing site is currently a surface parking lot. The project will also provide 70 bicycle parking spaces, including 35 short-term and 35 long-term. Access to the site would be provided by a full service driveway on 27th Street.

Please note this DOT assessment does not constitute approval of the driveway dimensions and internal circulation schemes. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section (201 N. Figueroa Street, 5th Floor, Station 3, @ 213-482-7024).

If you have any questions, please call me at (213) 972-8482.

s:\letters\CEN20-49957_640 27th St parking lot ltr

c: Robert Katherman, Council District 9
Taimour Tanavoli, Case Management Office, DOT
Emily Wong, Gibson Transportation Consulting

DRAFT

MEMORANDUM

TO: Wes Pringle, Los Angeles Department of Transportation

FROM: Sarah M. Drobis, P.E.
Emily Wong, P.E.

DATE: June 2, 2020

RE: Site Access and Circulation Evaluation for the
Automobile Club of Southern California
Parking Structure Project
Los Angeles, California

Ref: J1683

Gibson Transportation Consulting, Inc. reviewed the site access and circulation plan for the Automobile Club of Southern California (AAA) Parking Structure Project (Project) located at 640-700 W. 27th Street (Project Site) in the *South Los Angeles Community Plan* (City of Los Angeles Department of City Planning [LADCP], November 2017) (Community Plan) area of Los Angeles, California (City). As detailed in the Los Angeles Department of Transportation (LADOT) Referral Form, a transportation study is not required for “any project only installing a parking lot or parking structure.” Further, trip generation is based on the size and type of land use included in a development and is independent from parking supply. Thus, the Project itself would not generate new trips or vehicle miles traveled (VMT). Therefore, based on the screening criteria identified in Section 2.2.2 of the *Transportation Assessment Guidelines* (LADOT, July 2019) (TAG), a no impact determination could be made for the Project. Nevertheless, a review of the Project’s site access and circulation plan was conducted for informational purposes, and this memorandum summarizes the evaluation.

PROJECT DESCRIPTION

The Project is proposing the construction of a new four and a half-story parking structure with up to 750 parking spaces, including accessible and electric vehicle parking spaces, to serve the existing and future parking demand of the AAA Headquarters located immediately to the north of the Project Site at 2601 S. Figueroa Street. Access to the Project Site would be provided via a full access driveway along 27th Street. The Project would also provide up to 70 bicycle parking spaces, including 35 short-term spaces and 35 long-term spaces. A marked pedestrian crossing along 27th Street would also be provided between the Project and the AAA Headquarters. The Project would satisfy the parking demand for the AAA Headquarters employees using other AAA and/or public parking lots, as well as reduce potential spillover into the adjacent neighborhoods. The Project would replace the existing 247-space surface parking lot currently on-site that serves the AAA Headquarters employees. Thus, the Project would be consistent with Policy M10.3 of the Community Plan, which supports the development of parking structures where appropriate and discourages surface parking lots. The Project site plan is provided in Figure 1.

PROJECT SITE LOCATION

As illustrated in Figure 2, the Project Site is bounded by 27th Street to the north, residential uses to the east and west, and an alley to the south. The surrounding land uses consist of residential and commercial uses. Primary regional access to the Project Site is provided via the Harbor Freeway (I-110) and the Santa Monica Freeway (I-10), which are located approximately 0.15 miles west and 0.75 miles north of the Project Site, respectively. Access to I-110 is available via interchanges at Adams Boulevard, and access to I-10 is available via interchanges at Washington Boulevard. The Project Site is served by major arterial streets such as Figueroa Street and Adams Boulevard.

Further, in the vicinity of the Project Site, protected bicycle lanes are provided on both sides of Figueroa Street. Sidewalks along 27th Street provide connectivity to signalized pedestrian crossings at the intersections of Figueroa Street & Adams Boulevard and Figueroa Street & 28th Street. It should be noted that the intersection of Figueroa Street & Adams Boulevard provides high-visibility continental crosswalks.

SITE ACCESS AND CIRCULATION

As previously detailed, access to the Project Site would be provided via one full access driveway along 27th Street that would accommodate both left and right-turn ingress and egress maneuvers. Access to the Project Site would be concentrated to a single driveway, which would utilize the existing curb cut at the northwestern corner of the Project Site. The remaining curb cuts that currently serve the existing surface parking lot would be removed with development of the Project, thus minimizing interference to pedestrian flow and improving pedestrian safety along the adjacent sidewalk. In addition, a separate pedestrian access point would be placed adjacent to a proposed marked pedestrian crosswalk across 27th Street that would provide employees with a convenient connection between the Project Site and the AAA Headquarters. The pedestrian crosswalk would be designed with American with Disabilities Act accessible ramps at both ends.

27th Street is a designated Local Street in *Mobility Plan 2035, An Element of the General Plan* (LADCP, January 2016) (Mobility Plan) that provides access to nearby residential developments along the approximate 0.25-mile street segment. The placement of the Project driveway along 27th Street is consistent with the site access guidance in TAG, which recommends driveways be placed along low-volume local streets rather than an arterial street to minimize potential queuing on an Avenue or Boulevard, as designated in the Mobility Plan.

The Project's site access and internal circulation plan would be designed in accordance with LADOT standards outlined in Section 321 of *Manual of Policies and Procedures* (LADOT, December 2008). Consistent with *Manual of Policies and Procedures*, the Project driveway, which serves a project frontage greater than 250 feet, would be placed at a distance greater than 75 feet from the adjacent intersection of Figueroa Street & 27th Street. The driveway width would be designed to safely facilitate ingress and egress maneuvers without interference between the two. The driveway would also be placed at a distance from the pedestrian access to limit potential vehicle-pedestrian conflicts. The driveway would also be designed to limit potential obstructions to adequate sight distance.

As previously noted, the Project would also provide both short-term and long-term bicycle parking. Bicyclists would access the long-term bicycle parking within the Project via the pedestrian access point. The short-term bicycle parking spaces would be provided along the Project frontage. Convenient connections between the bicycle parking spaces to the AAA Headquarters also would be provided via the marked pedestrian crossing across 27th Street.

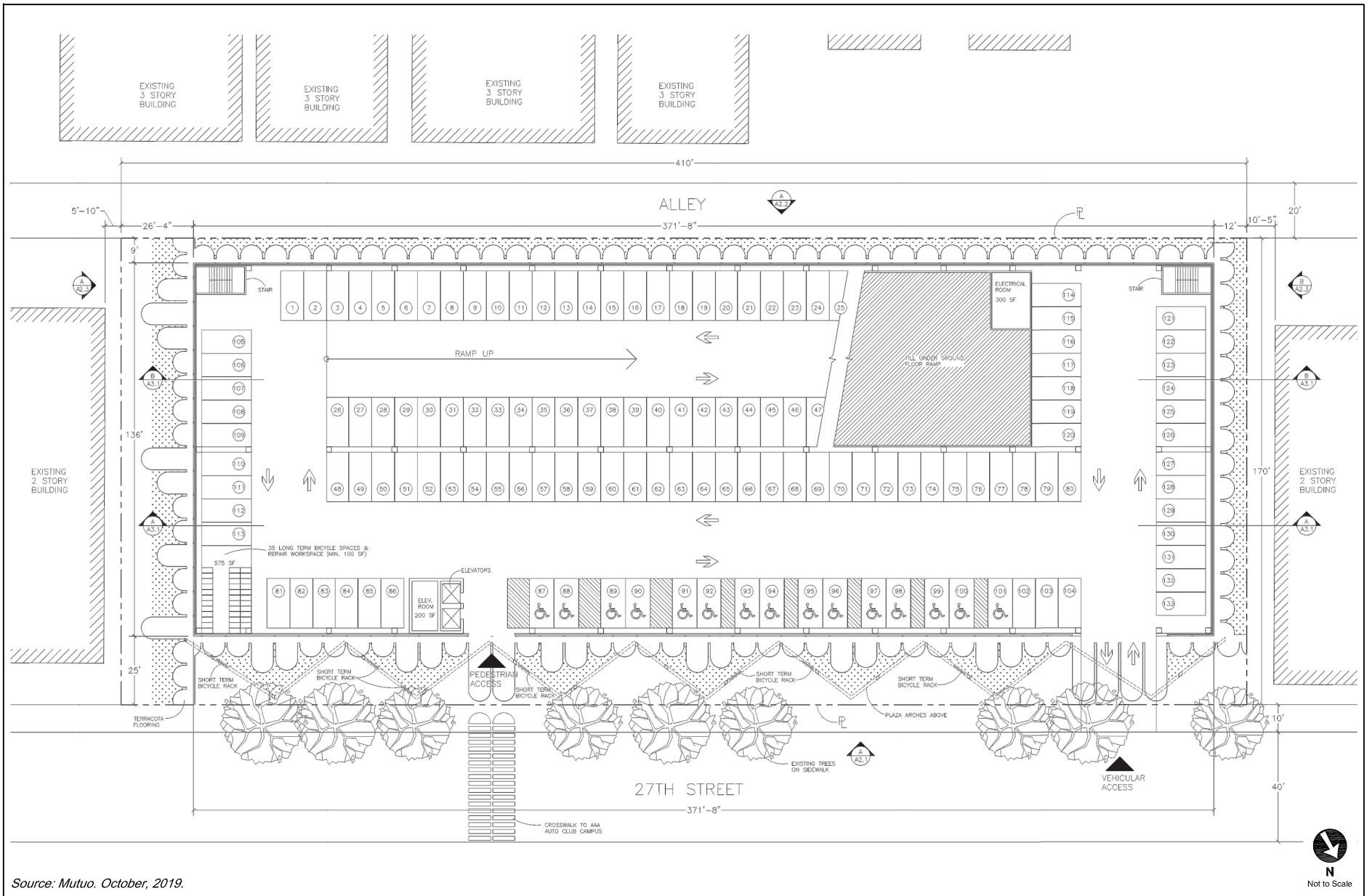
Operational Review

The Project would serve as a consolidated parking facility to accommodate the employee demand of the AAA Headquarters and would reduce the reliance on other off-site AAA surface parking lots and public parking facilities. Thus, the Project would reduce vehicle circulation on the adjacent arterial streets currently experienced by AAA Headquarters employees by providing a centralized parking structure.

The Project would also reduce the walking distance between the off-site parking facilities and the AAA Headquarters that employees currently travel. A marked pedestrian crossing would be provided between the parking facility and the AAA Headquarters to provide a convenient connection for employees. The Project would also improve the Project frontage by providing street trees and sidewalks to meet City standards, thus, enhancing the pedestrian environment and experience.

CONCLUSION

The Project would be designed to provide convenient vehicle, bicycle, and pedestrian access. The placement of the Project driveway along 27th Street, a designated Local Street, would reduce potential vehicle queuing along arterial streets. In addition, the Project would reduce employee reliance on off-site surface parking lots by consolidating the parking needs of the various facilities to a single facility. Further, the Project would not generate new trips or VMT and, therefore, per the TAG, the Project would not result in a significant impact.



Source: Mutuo, October, 2019.

PROJECT SITE PLAN

FIGURE
1



LEGEND

 Project Site



SITE LOCATION

FIGURE
2

APPENDIX H: ENERGY CONSERVATION CALCULATIONS

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AAA Parking Structure

Total Diesel Usage From Construction Equipment

Phase	Off-Road Equipment Type	Units	Hours	HP	Load Factor	Ave. Daily Factor	Number of Days	Diesel Usage (gallons)
Demolition	Concrete/Industrial Saw	1	8	81	0.73	0.6	10	142
Demolition	Tractor/Loader/Backhoe	3	8	97	0.37	0.6	10	258
Demolition	Rubber Tired Dozer	1	8	247	0.40	0.6	10	237
Grading	Rubber Tired Dozer	1	6	247	0.40	0.6	30	534
Grading	Tractor/Loader/Backhoe	1	7	97	0.37	0.6	30	226
Grading	Grader	1	6	187	0.41	0.6	30	414
Building Construction	Cranes	1	6	231	0.29	0.6	180	2,170
Building Construction	Forklifts	1	6	89	0.20	0.6	180	577
Building Construction	Tractor/Loader/Backhoe	3	7	97	0.37	0.6	180	4,070
Building Construction	Generator Sets	1	8	84	0.74	0.6	180	2,685
Building Construction	Tractor/Loader/Backhoe	1	6	97	0.37	0.6	180	1,163
Building Construction	Welders	3	8	46	0.45	0.6	180	2,683
Architectural Coating	Air Compressors	1	6	78	0.48	0.6	15	101
Paving	Cement and Mortar Mix	1	6	9	0.56	0.6	10	9
Paving	Pavers	1	6	130	0.42	0.6	10	98
Paving	Rollers	1	7	80	0.38	0.6	10	64
Paving	Paving Equipment	1	8	132	0.36	0.6	10	114
Paving	Tractor/Loader/Backhoe	1	8	97	0.37	0.6	10	86
							TOTAL	15,632

Sources: Equipment usage (hours and total days), horsepower (HP) and load factors are per the CalEEMod Worksheets; Fuel rate calculation is per the SCAQMD Air Quality Handbook (1993) Table A9-3E.

Electricity Usage from Watering During Construction (AQMD Rule 403: Fugitive Dust)

Phase	Duration of Phase (days)	Watering Days	Ave. Daily Acreage Disturbed	Water Use (gallons)	Electricity (kWhr)
Demolition	10	10	1.6	48,320	470.01
Grading	30	30	1.6	144,960	1,410.03
Building Construction	180		0	-	-
Architectural Coating	15		0	-	-
Paving	10		0	-	-
				TOTAL	1,880.03

Notes:

- Water Application Rate= 3,020 gal/acre/day per Air & Waste Management Association Air Pollution Engineering Manual (1992 Edition). Water application during the building demolition phase excludes surface parking lot, which would be removed during the grading phase.
- kWhr equivalent = 0.01 kWhr
- Electricity consumption per water useage = 0.009727 kWhr/gallon.

Construction Worker, Vendor, and Hauling Gasoline and Diesel Consumption

Phase	Daily Trips			Days	Total Trips			Trip Length			Ave. Daily Factor	Gasoline Usage (gallons)	Diesel Usage (gallons)
	Worker	Vendor			Worker	Vendor	Haul	Worker	Vendor	Haul			
Demolition	13	-		10	130	-	184	14.7	6.9	30	0.6	67	880
Grading	8	-		30	240	-	1,604	14.7	6.9	30	0.6	124	7,672
Building Construction	85	33		180	15,300	5,940	-	14.7	6.9	30	0.6	7,933	6,535
Architectural Coatings	17	-		15	255	-	-	14.7	6.9	20	0.6	132	-
Paving	13	-		10	130	-	-	14.7	6.9	20	0.6	67	-
TOTAL	136	33		245	16,055	5,940	1,788					8,325	15,087

Notes: Assumes an average fuel efficiency of 28.35 miles per gallon (mpg) for gasoline and 6.27 mpg for diesel per Table 7, Statewide Vehicle Fuel Economy Miles Per Gallon, 2007 California Motor Vehicle Stock Travel and Fuel Forecast (May 2008).

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	0.50	1000sqft	0.01	500.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
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 - Operational emissions for a temporary construction trailer - ignore all construction data

Land Use -

Construction Phase - Ignore all construction data

Off-road Equipment -

Energy Use -

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
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2.0 Emissions Summary

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
2	12-1-2020	2-28-2021	0.0091	0.0091
		Highest	0.0091	0.0091

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	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005
Energy	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	3.8952	3.8952	9.0000e-005	2.0000e-005	3.9043
Mobile	1.4100e-003	7.8500e-003	0.0189	6.0000e-005	5.1300e-003	7.0000e-005	5.1900e-003	1.3700e-003	6.0000e-005	1.4400e-003	0.0000	5.9619	5.9619	3.1000e-004	0.0000	5.9696
Waste						0.0000	0.0000		0.0000	0.0000	0.0954	0.0000	0.0954	5.6400e-003	0.0000	0.2364
Water						0.0000	0.0000		0.0000	0.0000	0.0282	0.9815	1.0097	2.9200e-003	7.0000e-005	1.1045
Total	3.4800e-003	8.1100e-003	0.0191	6.0000e-005	5.1300e-003	9.0000e-005	5.2100e-003	1.3700e-003	8.0000e-005	1.4600e-003	0.1236	10.8386	10.9623	8.9600e-003	9.0000e-005	11.2147

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005
Energy	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	3.8952	3.8952	9.0000e-005	2.0000e-005	3.9043
Mobile	1.4100e-003	7.8500e-003	0.0189	6.0000e-005	5.1300e-003	7.0000e-005	5.1900e-003	1.3700e-003	6.0000e-005	1.4400e-003	0.0000	5.9619	5.9619	3.1000e-004	0.0000	5.9696
Waste						0.0000	0.0000		0.0000	0.0000	0.0954	0.0000	0.0954	5.6400e-003	0.0000	0.2364
Water						0.0000	0.0000		0.0000	0.0000	0.0282	0.9815	1.0097	2.9200e-003	7.0000e-005	1.1045
Total	3.4800e-003	8.1100e-003	0.0191	6.0000e-005	5.1300e-003	9.0000e-005	5.2100e-003	1.3700e-003	8.0000e-005	1.4600e-003	0.1236	10.8386	10.9623	8.9600e-003	9.0000e-005	11.2147

	ROG	NOx	CO	SO2	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	Site Preparation	Site Preparation	1/2/2021	1/4/2021	5	1	

Acres of Grading (Site Preparation Phase): 0.5

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Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Graders	1	8.00	187	0.41
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

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
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.2 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					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	3.2000e-004	3.9100e-003	2.0100e-003	0.0000		1.5000e-004	1.5000e-004		1.4000e-004	1.4000e-004	0.0000	0.4276	0.4276	1.4000e-004	0.0000	0.4310
Total	3.2000e-004	3.9100e-003	2.0100e-003	0.0000	2.7000e-004	1.5000e-004	4.2000e-004	3.0000e-005	1.4000e-004	1.7000e-004	0.0000	0.4276	0.4276	1.4000e-004	0.0000	0.4310

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0239	0.0239	0.0000	0.0000	0.0239
Total	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0239	0.0239	0.0000	0.0000	0.0239

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3.2 Site Preparation - 2021

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					2.7000e-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	3.2000e-004	3.9100e-003	2.0100e-003	0.0000		1.5000e-004	1.5000e-004		1.4000e-004	1.4000e-004	0.0000	0.4276	0.4276	1.4000e-004	0.0000	0.4310
Total	3.2000e-004	3.9100e-003	2.0100e-003	0.0000	2.7000e-004	1.5000e-004	4.2000e-004	3.0000e-005	1.4000e-004	1.7000e-004	0.0000	0.4276	0.4276	1.4000e-004	0.0000	0.4310

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0239	0.0239	0.0000	0.0000	0.0239
Total	1.0000e-005	1.0000e-005	9.0000e-005	0.0000	3.0000e-005	0.0000	3.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0239	0.0239	0.0000	0.0000	0.0239

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.4100e-003	7.8500e-003	0.0189	6.0000e-005	5.1300e-003	7.0000e-005	5.1900e-003	1.3700e-003	6.0000e-005	1.4400e-003	0.0000	5.9619	5.9619	3.1000e-004	0.0000	5.9696
Unmitigated	1.4100e-003	7.8500e-003	0.0189	6.0000e-005	5.1300e-003	7.0000e-005	5.1900e-003	1.3700e-003	6.0000e-005	1.4400e-003	0.0000	5.9619	5.9619	3.1000e-004	0.0000	5.9696

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	5.52	1.23	0.53	13,498	13,498
Total	5.52	1.23	0.53	13,498	13,498

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
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.547828	0.043645	0.199892	0.122290	0.016774	0.005862	0.020637	0.032653	0.002037	0.001944	0.004777	0.000705	0.000956

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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	3.6175	3.6175	9.0000e-005	2.0000e-005	3.6249
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	3.6175	3.6175	9.0000e-005	2.0000e-005	3.6249
NaturalGas Mitigated	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794
NaturalGas Unmitigated	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794

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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					
General Office Building	5205	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794
Total		3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794

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					
General Office Building	5205	3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794
Total		3.0000e-005	2.6000e-004	2.1000e-004	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.2778	0.2778	1.0000e-005	1.0000e-005	0.2794

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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	6495	3.6175	9.0000e-005	2.0000e-005	3.6249
Total		3.6175	9.0000e-005	2.0000e-005	3.6249

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	6495	3.6175	9.0000e-005	2.0000e-005	3.6249
Total		3.6175	9.0000e-005	2.0000e-005	3.6249

6.0 Area Detail

6.1 Mitigation Measures Area

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	ROG	NOx	CO	SO2	Fugitive 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	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005
Unmitigated	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005

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	2.3000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.8100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005
Total	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	2.3000e-004					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	1.8100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005
Total	2.0400e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0000e-005	1.0000e-005	0.0000	0.0000	1.0000e-005

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	1.0097	2.9200e-003	7.0000e-005	1.1045
Unmitigated	1.0097	2.9200e-003	7.0000e-005	1.1045

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	0.0888669 / 0.0544668	1.0097	2.9200e-003	7.0000e-005	1.1045
Total		1.0097	2.9200e-003	7.0000e-005	1.1045

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7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	0.0888669 / 0.0544668	1.0097	2.9200e-003	7.0000e-005	1.1045
Total		1.0097	2.9200e-003	7.0000e-005	1.1045

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0954	5.6400e-003	0.0000	0.2364
Unmitigated	0.0954	5.6400e-003	0.0000	0.2364

AAA Parking Structure - Construction Trailer Only - South Coast AQMD Air District, Annual

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	0.47	0.0954	5.6400e-003	0.0000	0.2364
Total		0.0954	5.6400e-003	0.0000	0.2364

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	0.47	0.0954	5.6400e-003	0.0000	0.2364
Total		0.0954	5.6400e-003	0.0000	0.2364

9.0 Operational Offroad

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

AAA Parking Structure - Construction Trailer Only - South Coast AQMD Air District, Annual

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

APPENDIX I: CULTURAL RESOURCES RECORDS SEARCH

South Central Coastal Information Center

California State University, Fullerton
Department of Anthropology MH-426
800 North State College Boulevard
Fullerton, CA 92834-6846
657.278.5395

California Historical Resources Information System

Los Angeles, Orange, Ventura and San Bernardino Counties

sccic@fullerton.edu

3/13/2020

SCCIC File #: 21132.7096

Elise Lorenzana-Cronkrite
Parker Environmental Consultants
23822 Valencia Boulevard, Suite 301
Valencia, CA 91355

Re: Record Search Results for AAA Parking Structure Project [ENV-2019-6290-EAF]

The South Central Coastal Information Center received your records search request for the project area referenced above, located on the Hollywood, CA USGS 7.5' quadrangle. The following summary reflects the results of the records search for the project area and a ½-mile radius. The search includes a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest (SPHI), the California Historical Landmarks (SHL), the California Register of Historical Resources (CAL REG), the National Register of Historic Places (NRHP), the California State Built Environment Resources Directory (BERD), and the City of Los Angeles Historic-Cultural Monuments (LAHCM) listings were reviewed for the above referenced project site and a ¼-mile radius. Due to the sensitive nature of cultural resources, archaeological site locations are not released.

RECORDS SEARCH RESULTS SUMMARY

Archaeological Resources* (*see Recommendations section)	Within project area: 0 Within ½-mile radius: 0
Built-Environment Resources	Within project area: 0 Within ½-mile radius: 44
Reports and Studies	Within project area: 0 Within ½-mile radius: 24
OHP Built Environment Resources Directory (BERD) 2019	Within project area: 0 Within ¼-mile radius: 26
California Points of Historical Interest (SPHI) 2019	Within project area: 0 Within ¼-mile radius: 0
California Historical Landmarks (SHL) 2019	Within project area: 0 Within ¼-mile radius: 0
California Register of Historical Resources (CAL REG) 2019	Within project area: 0 Within ¼-mile radius: 13
National Register of Historic Places (NRHP) 2019	Within project area: 0 Within ¼-mile radius: 5

City of Los Angeles Historic-Cultural Monuments (LAHCM)	Within project area: 0 Within ¼-mile radius: 13
--	--

HISTORIC MAP REVIEW - Santa Monica, CA (1902, 1921) 15' USGS historic maps indicates that in 1902, there were two buildings within the project area. The area within the ½-mile search radius was highly developed with a dense network of improved roads and buildings which also included a University in the southern portion. The historic place name of Los Angeles was also present. In 1921, all previously mentioned features remained with the addition of several newly mapped buildings.

RECOMMENDATIONS

*When we report that no archaeological resources are recorded in your project area or within a specified radius around the project area; that does not necessarily mean that nothing is there. It may simply mean that the area has not been studied and/or that no information regarding the archaeological sensitivity of the property has been filed at this office. The reported records search result does not preclude the possibility that surface or buried artifacts might be found during a survey of the property or ground-disturbing activities.

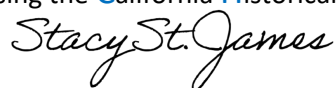
The project location has not been previously surveyed for the presence of cultural resources. It appears that all of the natural ground surface within the project area is obscured by back-top pavement; consequently, archaeological surface finds would be highly unlikely. However, buried prehistoric or historic cultural resources may be present. Therefore, in order to assess archaeological sensitivity, an archaeological monitor should be retained to monitor ground-disturbing activities as the existing pavement is removed and the ground is prepared for the new parking structure. In the event that any cultural resources are observed, all work within the vicinity of the find should be diverted until the archaeologist can assess and record the find and make recommendations. Excavation of potential cultural resources should not be attempted by project personnel. It is also recommended that the Native American Heritage Commission be consulted to identify if any additional traditional cultural properties or other sacred sites are known to be in the area. The NAHC may also refer you to local tribes with particular knowledge of potential sensitivity. The NAHC and local tribes may offer additional recommendations to what is provided here and may request an archaeological monitor.

For your convenience, you may find a professional consultant**at www.chrisinfo.org. Any resulting reports by the qualified consultant should be submitted to the South Central Coastal Information Center as soon as possible.

**The SCCIC does not endorse any particular consultant and makes no claims about the qualifications of any person listed. Each consultant on this list self-reports that they meet current professional standards.

If you have any questions regarding the results presented herein, please contact the office at 657.278.5395 Monday through Thursday 9:00 am to 3:30 pm. Should you require any additional information for the above referenced project, reference the SCCIC number listed above when making inquiries. Requests made after initial invoicing will result in the preparation of a separate invoice.

Thank you for using the California Historical Resources Information System,



Isabela Kott
GIS Technician/Staff Researcher

Enclosures:

(X) Invoice # 31132.7096

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

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DEPUTY DIRECTOR

June 26, 2020

Gabrieleño Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723

RE: Project CASE NO. ENV-2019-6290-MND

Dear Tribal Representative:

This letter is to inform you that the Los Angeles Department of City Planning is reviewing the proposed project described below. Per AB 52, the tribe has the right to consult on a proposed public or private project prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. A brief project description is as follows:

The Applicant, ASCS Management Services, Inc. proposes the demolition of an existing surface parking lot and the development of a new 202,200 square foot, four and a half-story parking structure with up to 750 parking spaces and is seeking approvals for the following, which shall constitute the "Project" or "Proposed Project" herein:

Permit the construction of a 202,200 square foot parking structure, approximately 48 feet and approximately 4 ½ stories in height, to include up to 750 parking spaces (including 15 ADA accessible spaces) and up to 70 long-term and short-term bicycle parking spaces. There will be no subterranean parking included as part of the project.

You have 30 calendar days from receipt of this letter to notify us in writing that you want to consult on this project. Please provide the lead contact person's contact information. Please mail your request to:

Sergio Ibarra
Los Angeles Department of City Planning
South / West Project Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

Sincerely,
Sergio Ibarra
City Planner
sergio.ibarra@lacity.org

The AB 52 consultation materials from the Gabrielino Band of Mission Indians – Kizh Nation are marked as confidential.

APPENDIX J: BIOLOGICAL RESOURCES RECORDS SEARCH

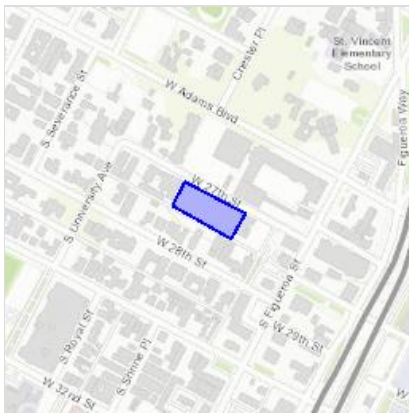
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Los Angeles County, California



Local office

Carlsbad Fish And Wildlife Office

☎ (760) 431-9440

📅 (760) 431-5901

2177 Salk Avenue - Suite 250

Carlsbad, CA 92008-7385

<http://www.fws.gov/carlsbad/>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
Coastal California Gnatcatcher <i>Poliophtila californica californica</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8178	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern
<http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds
<http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds
<http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
<p>Allen's Hummingbird <i>Selasphorus sasin</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9637</p>	Breeds Feb 1 to Jul 15
<p>Black Swift <i>Cypseloides niger</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8878</p>	Breeds Jun 15 to Sep 10
<p>Common Yellowthroat <i>Geothlypis trichas sinuosa</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/2084</p>	Breeds May 20 to Jul 31
<p>Costa's Hummingbird <i>Calypte costae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9470</p>	Breeds Jan 15 to Jun 10

<p>Marbled Godwit <i>Limosa fedoa</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481</p>	Breeds elsewhere
<p>Nuttall's Woodpecker <i>Picoides nuttallii</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9410</p>	Breeds Apr 1 to Jul 20
<p>Oak Titmouse <i>Baeolophus inornatus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9656</p>	Breeds Mar 15 to Jul 15
<p>Rufous Hummingbird <i>selasphorus rufus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002</p>	Breeds elsewhere
<p>Song Sparrow <i>Melospiza melodia</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds Feb 20 to Sep 5
<p>Spotted Towhee <i>Pipilo maculatus clementae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/4243</p>	Breeds Apr 15 to Jul 20
<p>Whimbrel <i>Numenius phaeopus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483</p>	Breeds elsewhere
<p>Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds elsewhere
<p>Wrentit <i>Chamaea fasciata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

Nuttall's Woodpecker BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)		+++	++ +					+			+	+++
Oak Titmouse BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)		+++	++++					++++	++ +		++++	++++
Rufous Hummingbird BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)			++	+++	++	++++	++++	++++	++++		++++	++++
Song Sparrow BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)	+++		++++						+		++++	++ +
Spotted Towhee BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)	+	++++	++++					++++	++++	+	++ +	+++
Whimbrel BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)			++++	++++	++++	++++	++++	++++	+++		++++	++++
Willet BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)			++++	++++	++++	++++	++++	++++	+++		++++	++++
SPECIES	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Wrentit BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)			++++						++++	+	++++	++++

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in

knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons

intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

APPENDIX K: WILL-SERVE LETTERS

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LOS ANGELES POLICE DEPARTMENT

MICHEL R. MOORE
Chief of Police



ERIC GARCETTI
Mayor

P. O. Box 30158
Los Angeles, CA 90030
Telephone: (213) 486-6000
TDD: (877) 275-5273
Ref #:1.18.2

February 2, 2020

Elise Lorenzana-Cronkrite
Parker Environmental Consultants
23822 Valencia Boulevard, Suite 301
Santa Clarita, CA 91355

Dear Elise Lorenzana-Cronkrite: [ENV-2019-6290-EAF]


The proposed, "AAA Parking Structure Project," located at 640-700 W. 27th Street Los Angeles CA. 90007, is located in Reporting District 0328. This "RD" falls within the geographical boundaries of the Los Angeles Police Department's Southwest Division. A project of this size could have a minor impact on police services within Southwest Division's Community area. The Department is available to advise you on crime prevention features appropriate for the design of the property in this project. The Department strongly recommends that the developers contact Community Outreach and Development Division, Crime Prevention Through Environmental Design Officer (CPTED), James Nichols at e-mail address: CPTED@lapd.online

Upon completion of the project, you are encouraged to provide the Commanding Officer of Southwest Division's Community Police Station with a diagram copy of each portion of the property. The Southwest Community Police Station's Commanding Officer is Captain Billy Brockway. Southwest Division is located at 1546 W. Martin L. King Boulevard Los Angeles CA 90062 (RD 0395). Captain Brockway's phone number is 213-485-2580. The diagram should include access routes and any additional information that might facilitate police response.

Should you have any further questions, please contact Officer James Nichols at the LAPD Community Outreach and Development Division, (213) 486-6000.

Respectfully,

MICHEL R. MOORE
Chief of Police


AARON C. PONCE, Captain
Commanding Officer
Community Outreach and Development Division

Enclosure

The following report was prepared for The AAA Parking Structure Project:

The AAA Parking Structure Project located at 640-700 W. 27th Street in Los Angeles CA., is approximately 2.6 miles at 10 minutes from the Southwest Division Community Police Station. This time and distance is calculated from a departure point starting from Southwest Division Community Police Station. The Reporting District for Southwest Division is RD 0395. Their Phone number is 213-485-2582. This arrival time is also configured utilizing some traffic delays, but estimated times of arrival can vary depending on divisional call load, traffic delays and type of call.

Divisional Geographics / Demographics:

Southwest Community Police Station's Geographical Area is approximately 13.11 square miles and consists of 58 Reporting Districts. The service boundaries for Southwest Area are as follows:

To the West is South Victoria Avenue, Crenshaw Boulevard, Stocker Street, La Brea Avenue, Kenneth Hahn State Recreational Area, Los Angeles County Border, South La Cienega Boulevard, Culver City Border, Ivy Way, Culver City Border, Jefferson Boulevard and Fairfax Avenue.

To the North is The Santa Monica 10 Freeway.

To the East is The Harbor 110 Freeway.

To the South is West Vernon Avenue, South Van Ness Avenue and West 52nd Street.

The proposed AAA Parking Structure Project is located in RD 0328. The boundaries for RD 0328 are Hoover Street to the West. West Adams Boulevard to the North, Figueroa Street to the East and West Jefferson Boulevard to the South.

Southwest Division has approximately 352 sworn personnel and 32 civilian support staff. Southwest Division is a culturally diverse community with a residential population of over 165,000 people. The officer to resident ratio is 1 officer to every 469 residents (469:1). This population amount does not reflect citizens from outside the area visiting local businesses, churches, residences and educational institutions.

Divisional Support and Communication:

There are many specialized support units, divisions and services available to Southwest Division within the LAPD. These services are available to supplement the division's policing. In using the available resources, the Los Angeles Police Department can meet the demands for police services for the AAA Parking Structure Project.

Southwest Community Police Station's emergency response system is directly linked to the Los Angeles Police Departments' Communication Dispatch Center. Communication Division has the responsibility to staff and answer telephone calls for service on a 24- hour basis. This includes 911 emergency calls (police, fire and medical). Communication Division's main protocol is to handle and dispatch police calls for service in the City of Los Angeles.

Divisional Response Times:

According to the Los Angeles Police Department’s Computer Statistics (CompStats) Division, the average police response time to emergency, high priority calls in the Southwest Area (Code 3 calls) was 3.9 minutes. The medium high priority response time (Code 2) was 11.1 minutes and the low priority, non-emergency response time is 25.5 minutes. These response times were taken from the statistics submitted by Southwest Division for December 29th 2019 through January 25th 2020.

During this 4 week period, Southwest Division answered, 394 emergency calls for service, 1,409 medium high priority calls and 1,487 low priority calls. The response times stated are adequate performance times for this police division.

Statistics:

The following are one month crime statistics for RD 0328 and five year crime statistics for Southwest Division (SOW) for the years 2016- 2020:

Southwest Division Crime YTD and 5 year totals	2020	2019	2018	2017	2016	Crime in RD 0328 12-29-2019 / 01-25-2020
Violent Crime	145	2096	2400	2415	2271	17
Property Crime	323	5371	6086	5975	5838	3
Homicide	2	15	25	20	33	0
Rape	6	112	139	130	162	0
Robbery	62	712	876	875	827	3
Aggravated Assault	75	1257	1360	1390	1249	1
Burglary	38	560	757	858	795	0
Motor Vehicle Theft	59	782	889	1027	977	0
Burglary Theft From Vehicle	93	1614	1770	1568	1490	2
Personal/Other Theft	133	2415	2670	2522	2576	1
Simple Assault	79	2701	2647	2667	2767	13

12 Month Crime 2019 SOW	Violent Crime	Property Crime	Homicide	Rape	Robbery	Aggravated Assault	Burglary	Motor Vehicle Theft	Burglary Theft From Vehicle	Personal / Other Theft
JAN	162	468	1	7	62	92	45	68	156	199
FEB	129	387	1	1	56	71	42	56	111	178
MAR	155	399	2	9	45	99	43	55	113	188
APR	190	370	0	7	67	116	35	65	105	165
MAY	169	354	2	6	59	102	40	63	103	148
JUN	144	363	1	8	47	88	45	46	107	165
JUL	151	365	1	9	43	98	37	52	113	163
AUG	152	418	2	8	39	103	36	70	134	178
SEP	158	441	0	9	62	87	38	54	131	218
OCT	187	394	2	9	62	114	46	59	99	190
NOV	137	438	1	8	51	77	55	58	134	191
DEC	141	402	1	4	55	81	42	69	121	170

6 Month Crime 2018	Violent Crime	Property Crime	Homicide	Rape	Robbery	Aggravated Assault
JAN	167	440	3	17	71	76
FEB	161	507	2	15	62	82
MAR	158	410	2	15	61	90
APR	162	461	1	7	63	91
MAY	192	436	4	3	72	113
JUN	185	393	1	7	60	117

6 Month Crime 2018	Violent Crimes	Property Crimes	Homicide	Rape	Robbery	Aggravated Assault
JUL	211	456	5	8	79	119
AUG	196	458	0	12	63	121
SEP	167	412	1	9	60	97
OCT	180	493	1	13	66	100
NOV	188	543	1	9	73	105
DEC	191	427	2	4	72	113

6 Month Crime 2018	Burglary	Motor Vehicle Theft	Burglary Theft from Vehicle	Personal / Other Theft	Simple Assault
JAN	58	83	118	181	68
FEB	68	70	145	224	81
MAR	50	44	125	191	75
APR	57	55	134	215	94
MAY	66	82	108	180	100
JUN	53	54	123	163	84

6 Month Crime 2018	Burglary	Burglary Theft From Vehicle	Motor Vehicle Theft	Personal / Other Theft	Simple Assault
JUL	60	88	145	163	88
AUG	58	59	135	206	110
SEP	47	59	121	185	82
OCT	48	71	141	233	101
NOV	60	69	151	263	74
DEC	43	56	145	183	80

This concludes the AAA Parking Structure Project, Environmental Impact Report. If there are any further questions regarding this report, please email them to CPTED@lapd.online for the fastest response time.

Thank You,

Prepared by:

James Nichols
 Los Angeles Police Department
 Community Outreach and Development Division
 Crime Prevention Through Environmental Design Unit
 E-mail: CPTED@lapd.online
 213-486-6000

APPENDIX L: LAND USE CONSISTENCY TABLES

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APPENDIX L

Consistency Analysis Tables

This Appendix evaluates the Proposed Project’s potential impacts relative to conflicts with policies, plans, or ordinances adopted specifically to mitigate or avoid an environmental impact. The Appendix identifies the existing zoning regulations (i.e., the Los Angeles Municipal Code) and various elements and policies of the City of Los Angeles General Plan, including the Wilshire Community Plan, that are applicable to the Project Site or Project, and provides a consistency analysis with respect to how the Proposed Project conforms to said plans. Additionally, this Appendix identifies applicable regional planning policies and analyzes the Proposed Project’s consistency with applicable objectives, policies, and permits.

(1) Consistency with Regional Plans and Applicable Policies

(a) Consistency with the General Plan Framework Element

Table 1
Project Consistency with Applicable Objectives and Policies of the Framework Element

Objective / Policy	Project Consistency Analysis
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City’s long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	No Conflict. The Project would include a 4.5-story parking structure that would replace an existing surface parking lot for the associated AAA Headquarters building. The increased business opportunities in the surrounding area for other small businesses to serve AAA employees, such as restaurant and retail land uses. Thus, the Project would support this objective. Further, compliance with regulatory compliance measures would ensure that the new structure maintains a safe, clean, attractive and lively environment during the Project’s construction and operation.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses, and visitors.	No Conflict. As discussed previously, the Project includes construction of a 4.5-story parking structure to serve the nearby AAA building, which is anticipated to hire new employees. The increase in new employees would increase the foot traffic of nearby businesses, such as restaurant and retail businesses. The increase of employees would support nearby businesses and improve the economy vitality of the surrounding area.
Policy 3.1.2: Allow for the provision of sufficient	No Conflict. The Project Site is occupied by a surface

Objective / Policy	Project Consistency Analysis
<p>public infrastructure and services to support the projected needs of the City's population and businesses.</p>	<p>parking lot, a land use that it not typically powered by utilities. The Project would utilize electricity to light the interior and exterior portions of the new parking structure. Since the Project Site is surrounding by multi-family and commercial uses, the Project Site would be adequately supported by utilities (including water service, sewer service, electrical, and natural gas), and public services (such as police, fire, schools, and recreation/parks).</p>
<p>Objective 3.3: Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.</p>	<p>No Conflict. As discussed below in response to Checklist Question XIV a) Population and Housing, the Project's estimated employment growth would not conflict with SCAG's future growth projections for the City of Los Angeles.</p>
<p>Objective 3.5: Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.</p>	<p>No Conflict. The Project would replace the existing surface parking lot with the development of a 4.5-story parking structure. The Project Site is surrounded by multi-family residential to the east, west, and south. Commercial office buildings are located north of the Project Site. No single-family residential neighborhoods are located near the Project Site. The Project is seeking a zone change and height district change from RD1.5-1-O to C2-2-O, and a General Plan amendment to change the land use designation from "Low Medium II Residential" to "Community Commercial." The C2 zone allows for parking structures. The Project would develop a parking structure that would be visually compatible with the surrounding commercial and office uses. Therefore, the Project would enhance the character of the surrounding commercial and office area and be consistent with this policy.</p>
<p>Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.</p>	<p>No Conflict. The Project's design would be compatible with the historic character of the neighborhood. The minimized building footprint allows for the addition of sustainable landscape features along 27th street that would improve the pedestrian experience on the sidewalk and serve to make the Project Site a more inviting space for the entire community. The Project plans to provide drought-tolerant landscaping along with maintaining the existing trees to make the area more visually appealing. Further, the Project's design features and landscaping, which represents a welcome replacement of the surface parking lot that currently occupies the Project Site. The Project would also be compatible with the surrounding structures. With the additional on-site long-term and short-term bicycle parking, the Project would also encourage employees to choose non-private modes of transportation to work, reducing vehicular travel and increasing pedestrian activity in the area.</p>
<p>Source: City of Los Angeles Department of City Planning, Framework Element, December 11, 1996.</p>	

(b) Consistency with the South Los Angeles Community Plan

**Table 2
Project Consistency with Applicable Goals and Policies of the
South Los Angeles Community Plan Land Use Element for Commercial Land Uses**

Goal / Policy	Project Consistency Analysis
Commercial	
<p>Goal LU6: A commercial sector that is strong and competitive, that serves the needs of individual neighborhoods and the broader community, and that provides local residents with access to high quality jobs providing a pathway out of poverty.</p>	<p>No Conflict. The Project would develop a new parking structure to support and promote an increase in job opportunities at the AAA Headquarters. The new jobs are anticipated to include a combination of entry-level and specialty positions that would positively impact growth in the community by way of employment and also stimulate the nearby commercial amenities. Further, The Project would provide new foot traffic to the business in the surrounding area, such as restaurants and retail. Thus, the Project would not conflict with this policy.</p>
<p>Policy LU6.1: Local Jobs. Maintain and increase the commercial employment base for community residents, including those facing barriers to employment, through local hiring, living wage provisions, job resource centers and job training.</p>	<p>No Conflict. The Project would increase the number of parking spaces on-site for the adjacent AAA Headquarters, which would allow for new employees. The Project would then allow for the increase in the employment base in the area. Thus, the Project would not conflict with this policy.</p>
<p>Policy LU6.2: Feasible Development Sites. Encourage consolidation and deepening of shallow commercial corridor lots in a manner that is compatible with the prevailing urban form as a means to stimulate existing businesses and create feasible opportunities for new development.</p>	<p>No Conflict. The Project would develop a new parking structure to support and promote new jobs at the AAA Headquarters. These jobs are anticipated to include a combination of entry-level and specialty positions that would impact growth in the community by way of employment and also stimulate the nearby commercial amenities. Further, replacing the existing surface lot with a parking structure will create a new, well-designed structure in the area, in turn attracting new employees to revitalize the commercial corridor along S. Figueroa Street. Thus, the Project would not conflict with this policy.</p>
<p>Policy LU6.4: Encourage Office Uses. Encourage the development of business, professional and medical offices along commercial corridors within a variety of building typologies.</p>	<p>No Conflict. The Project would include the construction of a parking structure, which would allow the associated AAA office building to expand and hire new employees to the commercial corridors along Figueroa Street. As such, the Project would not conflict with this policy.</p>
<p>Policy LU6.6: Minimize Displacement of Small Businesses. Encourage the retention of existing small businesses that strengthen the local economic base of the Community Plan Area.</p>	<p>No Conflict. The Project would replace an existing surface parking lot with an above-grade parking structure. The Project would not replace any existing small businesses. As such, the Project would not conflict with this policy.</p>
<p>Policy LU7.2: Improve Existing Auto-Related Uses. Expansions and modifications of existing auto-related facilities should be designed to improve landscaping, buffering and architectural character in order to minimize environmental impacts.</p>	<p>No Conflict. The Project would replace an existing surface lot with an above-grade parking structure that would enhance the pedestrian experience and screens views of the parked vehicles. Additionally, the proposed design would allow for the incorporation of landscaping both along the 27th Street frontage, as well as along the secondary building facades. As such, the Project</p>

	would not conflict with this policy.
Policy LU11.6: Native and Drought-Tolerant Landscaping. Encourage the use of native and drought-tolerant plants in all new development to conserve water use.	No Conflict. The Project design incorporates drought-tolerant landscaping on all sides of the Project Site. The landscaping would be incorporated into the pedestrian experience and replace existing impermeable surface parking areas. Existing street trees would be maintained. As such, the Project would not conflict with this policy.
<i>Source: City of Los Angeles, Land Use and Planning Element, South Los Angeles Community Plan, November 2017. Parker Environmental Consultants, 2019.</i>	

(c) *Consistency with the Exposition/University Park Redevelopment Plan*

**Table 3
Project Consistency with the Goals of the Fourth Amendment to the
Exposition/University Park Redevelopment Plan**

Goal	Project Consistency Analysis
(1) To encourage the cooperation and participation of residents, property owners, business persons, public agencies and community organizations in the revitalization of the area.	No Conflict. The Project would develop an underutilized site that is currently occupied by surface parking. The Project would involve the development of a 4.5-story parking structure to serve the adjacent AAA building, which would allow the expansion and employment growth of this business. The Project's anticipated employment growth would attract new patrons and visitors to the surrounding area. The Project would promote increased foot traffic for the surrounding restaurant and retail businesses in the vicinity of the Project Site. Thus, the Project is consistent with the goal.
(2) To promote the general welfare of the area in coordination with revitalization by promoting cultural activities, safety, and environmental quality.	No Conflict. The Project would redevelop an underutilized site that is currently developed with a surface parking lot. Compliance with all applicable building code requirements would ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Project would not conflict with this goal.
(3) To retain by means of rehabilitation residences and businesses where appropriate.	No Conflict. The Project would replace an existing surface parking lot with an above-grade parking structure. The Project would not demolish any existing residences or businesses. As such, the Project would not conflict with this goal.
(4) To eliminate and prevent the spread of blight and deterioration and to conserve, rehabilitate, and redevelop the Expanded Project Area in accordance with the Plan.	No Conflict. The Project would redevelop an underutilized site that is currently developed with a surface parking lot. Compliance with all applicable building code requirements would ensure that the building maintains a safe, clean, and attractive environment during the Project's construction and operation. As such, the Project would prevent the spread of blight and deterioration by redeveloping an

	underutilized site in accordance with the Plan. As such, the Project would not conflict with this goal.
(5) To make provisions for housing as is required to satisfy the needs and desires of the various age, income, and ethnic groups of the community, maximizing the opportunity for individual choice.	Not Applicable. The Project would not include any housing or residential components. As such, this goal is not applicable to the Project.
(6) To alleviate overcrowded, substandard housing conditions and to promote the development of a sufficient number of housing units for low and moderate income households.	Not Applicable. The Project would not include any housing or residential components. As such, this goal is not applicable to the Project.
(7) To make provisions, throughout the Expanded Project Area, for well-planned community uses, facilities, pedestrian and vehicular circulation, and adequate parking, particularly as these relate to Exposition Park.	No Conflict. The Project would develop a new parking structure to support and promote an increase in new jobs at the AAA Headquarters. The employment growth in the community would also stimulate the nearby commercial amenities. Further, replacing the existing surface lot with a parking structure will create a new, well-designed structure in the area, in turn attracting new employees to revitalize the commercial corridor along S. Figueroa Street. As such, the Project would not conflict with this goal.
(8) To promote coordinated management of Exposition Park with specific attention given to facility use, development, parking, circulation, security and maintenance.	No Conflict. The Project would replace an existing surface lot with an above-grade parking structure that would enhance the pedestrian experience and screens views of the parked vehicles. Additionally, the proposed design would allow for the incorporation of landscaping both along the 27 th Street frontage, as well as along the secondary building facades. As such, the Project would not conflict with this goal.
(9) To implement the City's policy to establish "opportunity areas" to specifically encourage private investment, consistent with the Plan's objectives in housing, commerce and industry.	No Conflict. This goal is directed towards the City and is not specifically applicable to the Project. However, the Project would encourage the expansion of an existing commercial business, which would help increase the greater Project economic area. As such, the Project would not conflict with this goal.
(10) To provide a basis for the location and programming of public service facilities, parks and recreation facilities.	No Conflict. The Project would not include any public service facilities, but would be landscaped to encourage a safe and well-designed structure to enhance the surrounding residential and commercial area. As such, the Project would not hinder the objective of this goal.
(11) To encourage a thriving commercial environment which will contribute to neighborhood improvement.	No Conflict. As mentioned previously, the Project would involve the development of a 4.5-story parking structure to serve the adjacent AAA building, which would allow the expansion and employment growth of this business. The Project's anticipated employment growth would attract new patrons and visitors to the surrounding area. The Project would promote increased foot traffic for the surrounding restaurant and retail businesses in the vicinity of the Project Site. The Project would help increase the greater Project economic area. As such, the Project would not conflict with this goal.
(12) To encourage the preservation of historical monuments, landmarks and buildings.	No Conflict. The Project Site is currently developed with a surface parking lot. Therefore, no historic

	resources are located on the Project Site. The development of the Project would not demolish any historical resources. As such, the Project would not conflict with this goal.
(13) To coordinate on behalf of the Expanded Project Area public program activity consistent with the provisions of the Plan between the Agency, the Project Area Committee, the City of Los Angeles, the County of Los Angeles, and the State of California, and the United States government.	No Conflict. This goal is directed towards the City and is not specifically applicable to the Project. The Project would be designed and developed with the guidance of the Department of City Planning, and other necessary City departments. Additionally, the Project would be designed in accordance with plans and design guidelines that have jurisdiction over the Project Site. As such, the Project would not conflict with this goal.
<i>Source: The Community Redevelopment Agency of the City of Los Angeles, Fourth Amendment to the Redevelopment Plan (As Amended) for the Hoover Redevelopment Project, May 11, 1983. Parker Environmental Consultants, 2019.</i>	