COUNTY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 395
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(PRC Section 21152; CEQA Guidelines Section 15062)

Pursuant to Public Resources Code § 21152(b) and CEQA Guidelines § 15062, the notice should be posted with the County Clerk by mailing the form and posting fee payment to the following address: Los Angeles County Clerk/Recorder, Environmental Notices, P.O. Box 1208, Norwalk, CA 90650. Pursuant to Public Resources Code § 21167 (d), the posting of this notice starts a 35-day statute of limitations on court challenges to reliance on an exemption for the project. Failure to file this notice as provided above, results in the statute of limitations being extended to 180 days.

PARENT CASE NUMBER(S) / REQUESTED ENTITLEMENTS
DIR-2019-1492-TDR-SPR / Transfer of Floor Area, Site Plan Review

LEAD CITY AGENCY	CASE NUMBER
City of Los Angeles (Department of City Planning)	ENV-2019-1493-CE
PROJECT TITLE	COUNCIL DISTRICT
1323 S. Flower Street	14 - de León

PROJECT LOCATION (Street Address and Cross Streets and/or Attached Map) ☐ Map attached.
1323 S. Flower Street, Los Angeles, CA 90015

PROJECT DESCRIPTION: ☐ Additional page(s) attached.
The project includes the demolition of an existing 31,000 square-foot light manufacturing building currently used for parking, and the construction, use, and maintenance of an 11-story, 117,794 square foot, mixed use development containing 100 hotel guest rooms, 48 market rate apartments, and ground floor and rooftop restaurants. The project will provide 158 auto parking spaces, 76 bicycle parking spaces, and 5,941 square feet of usable open space. There are no trees or shrubs on the project site that would be considered either protected or non-protected. There is one tree located in the parkway perimeter that will be retained and protected in place. The project also includes the planting of eleven (11) 24-inch box trees.

NAME OF APPLICANT / OWNER:
Elliot Tishbi, Tishbee's LLC (Applicant/Owner)

CONTACT PERSON (If different from Applicant/Owner above)	(AREA CODE) TELEPHONE NUMBER | EXT.
R. (Rudy) Nicolas Brown (Representative)	(661) 753-9861

EXEMPT STATUS: (Check all boxes, and include all exemptions, that apply and provide relevant citations.)

STATE CEQA STATUTE & GUIDELINES

☐ STATUTORY EXEMPTION(S)

Public Resources Code Section(s) _____

☒ CATEGORICAL EXEMPTION(S) (State CEQA Guidelines Sec. 15301-15333 / Class 1-Class 33)

CEQA Guideline Section(s) / Class(es) **Section 15332 / Class 32**

☐ OTHER BASIS FOR EXEMPTION (E.g., CEQA Guidelines Section 15061(b)(3) or (b)(4) or Section 15378(b))

_____

JUSTIFICATION FOR PROJECT EXEMPTION: ☒ Additional page(s) attached
See the attached justification.

☒ None of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project.
☐ The project is identified in one or more of the list of activities in the City of Los Angeles CEQA Guidelines as cited in the justification.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.
If different from the applicant, the identity of the person undertaking the project.

CITY STAFF USE ONLY:

CITY STAFF NAME AND SIGNATURE	STAFF TITLE
Eleanor Hunts	City Planning Associate
ENTITLEMENTS APPROVED	
TDR, SPR	

DISTRIBUTION: County Clerk, Agency Record
Rev. 6-22-2021

JUSTIFICATION FOR CATEGORICAL EXEMPTION CASE NO. ENV-2019-1493-CE

The Planning Department determined that the City of Los Angeles Guidelines for the implementation of the California Environmental Quality Act of 1970 and the State CEQA Guidelines designate the subject project as Categorically Exempt under Article 19, Section 15332, Class 32.

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the conditions as follows: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations; (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses; (c) The project site has no value as habitat for endangered, rare or threatened species; (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and (e) The site can be adequately served by all required utilities and public services.

The proposed project is for demolition of the existing 31,000 square-foot light manufacturing building currently used for parking, and the construction, use, and maintenance of an 11-story, 117,794 square-foot mixed-use development containing including 9,585 square feet of indoor restaurant space, 3,091 square feet of outdoor terrace restaurant space, 100 hotel guest rooms, and 48 market-rate residential units. The building will be 138'-9 ¼" in height from the lowest grade to the top of the roof parapet and have a 5.22:1 FAR. The unit mix will be comprised of seven (7) two-bedroom units, 39 one-bedroom units, and two (2) studio units. There will be 158 total parking spaces provided in two subterranean parking levels and a total of 76 bicycle parking spaces—20 short-term and 56 long-term. The project will provide 5,941 square feet of usable open space. There are no trees or shrubs on the project site that would be considered either protected or non-protected. There is one tree located in the parkway perimeter that will be retained and protected in place. The project also includes the planting of eleven (11) 24-inch box trees. The proposed project will export 24,472 cubic yards of earth. However, it is not located in a Special Grading Area based on the latest Bureau of Engineering Basic Grid Map A-13372, so a haul route approval from the Board of Building and Safety is not required.

The project is requesting the following discretionary actions:

1. **A Site Plan Review** for the development project which creates 50 or more guest rooms; and

2. **A Floor Area Deviation to allow a Transfer of Floor Area** of less than 50,000 square feet to permit an increase in floor area of approximately 49,991 square feet for a total floor area of 117,794 square feet or a 5.22:1 Floor Area Ratio (FAR) in lieu of a maximum of 3.0:1 FAR as otherwise permitted.

The proposed project would not have a significant effect on the environment. A "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment" (CEQA Guidelines, Public Resources Code Section 21068). The proposed project and potential impacts were analyzed in accordance with the California Environmental Quality Act (CEQA) Guidelines, which establish guidelines and thresholds of significant impact, and provide the methods for determining whether or not the impacts of a proposed project reach or exceed those thresholds.

The proposed project has been determined to be Categorically Exempt from environmental review pursuant to Article 19, Section 15332 of the CEQA Guidelines (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Class 32 Categorical Exemption Criteria

As a project which is characterized as in-fill development, the project qualifies for the Class 32 Categorical Exemption as it meets the following criteria:

(a) The project is consistent with applicable general plan designation, applicable policies, and applicable zoning designations.

The subject property is located within the Central City Community Plan. Lot FR 7, 8, and 9 are zoned C2-2D-O and have a General Plan Land Use Designation of Community Commercial land uses corresponding to the CR, C2, C4, RAS3, and RAS4 Zone Classifications. The site is located within an "O" Oil Drilling Supplemental Use District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted pursuant to LAMC Section 13.01. However, neither the existing nor the proposed use involves oil drilling or production. As such, the provisions of said Code Section do not apply to the herein case.

The proposed project is consistent with the Goals, Objectives, and Policies of the Central City Community Plan and Framework Element as descried below.

Objective 1-1: *To promote development of residential units in South Park.*

Objective 1-2: *To increase the range of housing choices available to Downtown employees and residents.*

Objective 2-3: *To promote land uses in Central City that will address the needs of all the visitors to Downtown for business, conventions, trade shows, and tourism.*

Objective 2-4: *To encourage a mix of uses which create an active, 24-hour downtown environment for current residents and which would also foster increased tourism.*

The project is consistent with the Community Plan's vision of South Park as a mixed-use community with a concentration of residential and commercial uses, as it proposes 48 new dwelling units, 100 hotel guest rooms, and 12,676 square feet of restaurant space in proximity to other auxiliary support services such as retail, commercial, and office uses. The Community Plan anticipates job growth in South Park to attract large commercial projects that combine commercial and residential development and take advantage of the benefits of the unique downtown location, such as proximity to jobs, housing, and transit options. The mixed-use nature of the project, convenience to transit, and design elements such as the high levels of glazing on the ground floor restaurant space will help maintain an attractive and lively environment that will encourage pedestrian activity on the street. As such, the project conforms to the Central City Community Plan.

The proposed project is also consistent with the Goals, Objectives, and Policies, of the General Plan's Mobility Element, also known as Mobility Plan 2035, which sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility. Among other objectives and policies, the Mobility Plan aims to support ways to reduce vehicle miles traveled (VMT) per capita by increasing the availability of affordable housing options with proximity to transit stations and major bus stops, offering more non-vehicle alternatives including transit, walking, and bicycling. The project is consistent with the following Mobility Plan goal and policies.

Policy 3.3 *Land Use Access and Mix: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.*

Policy 3.4 *Transit Services: Provide all residents, workers and visitors with affordable, efficient, convenient, and attractive transit services.*

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

Policy 5.2 *Vehicle Miles Traveled (VMT): Support ways to reduce vehicle miles traveled (VMT) per capita.*

The project is served by multiple transit operators, including Los Angeles County Metropolitan Transportation Authority (Metro), Los Angeles Department of Transportation (LADOT), Santa Monica Big Blue Bus (BBB), Torrance Transit, and Foothill Transit. The site's proximity to the Pico Station (approximately .1 mile to the north), Grand/LATTC Station (approximately .5 mile to the south), LATTC/Ortho Institute Station (approximately .7 mile to the south), and the 7th Street/Metro Center Station (approximately 0.9 miles north), provide access to Metro's rail network as well as transfer opportunities to other services such as Amtrak and Metrolink. The bus routes that have stops within an approximately one-quarter mile radius of the project include Metro 14, 30, 33, 70, 76, 78, 81, 460, and 910 (Metro J/Silver Line); LADOT DASH F; LADOT Commuter Express 419, 422, 423, 431, 431B, 437A, 437B, 438, 438B, 439, and 448; BBB R10; Torrance Transit 4X; and Foothill Transit Silver Streak. The project's proximity to several transit options makes it easily accessible and highly connected to the greater Los Angeles area's public transportation system.

The project will provide convenient, secure, and well-maintained bicycle facilities in the public right-of-way as well as within the building, including 20 short-term parking spaces, 56 long-term parking spaces, and a 100-square-foot bicycle service area on the ground floor.

The project site is located within the City Center Redevelopment Plan, which was adopted by the Community Redevelopment Agency of Los Angeles (CRA/LA) in May 2002. On November 11, 2019, Ordinance No. 186,325 became effective, transferring the land use authority of the CRA/LA to the City of Los Angeles. The City Center Redevelopment Plan has the primary objective of eliminating and preventing blight in the Redevelopment Project Area. The project is consistent with the following objectives contained in Section 105 of the Redevelopment Plan.

> ***Objective 1.*** *To eliminate and prevent the spread of blight and deterioration and to rehabilitate and redevelop the Project Area in accordance with this Plan.*
>
> ***Objective 4.*** *To promote the development and rehabilitation of economic enterprises including retail, commercial, services, sports and entertainment, manufacturing, industrial and hospitality uses that are intended to provide employment and improve the Project Area's tax base.*
>
> ***Objective 5.*** *To guide growth and development, reinforce viable functions, and facilitate the redevelopment, revitalization or rehabilitation of deteriorated and underutilized areas.*
>
> ***Objective 6.*** *To create a modern, efficient and balanced urban environment for people, including a full range of around-the-clock activities and uses, such as recreation, sports, entertainment and housing.*

The proposed development furthers the development of Downtown as a major center of the Los Angeles metropolitan region by providing high density housing in conjunction with commercial uses. The Redevelopment Plan sets limits on floor area ratios, but states that they may exceed the maximum through a request for a transfer of floor area providing the resulting higher-density development is appropriate in location, compatible with other existing and proposed development, and consistent with the purposes of the Redevelopment Plan. The project includes the redevelopment of an underutilized site that produces a net increase of 48 new dwelling units, 100 new hotel guest rooms, and 12,676 square feet of restaurant space within walking distance of employment opportunities and attractions such as the Convention Center. This proximity and the project's mixed-use nature will encourage a balanced urban environment, including a range of around-the-clock activities and uses. The greater density will allow for improvements such as ground-floor restaurant space that will help eliminate and prevent blight and deterioration and redevelop the project area according to the Redevelopment Plan. As such, the project is substantially consistent with the Redevelopment Plan.

The project also substantially conforms with the standards and guidelines of the Downtown Design Guide. The purpose of the Design Guide is to encourage more livable and sustainable development in Downtown Los Angeles by addressing a project's relationship with its sidewalks, setbacks, ground floor treatment, parking, access, massing, street walls, on-site open space, landscaping, architectural detail, streetscape improvements, signage, public art, and connectivity to civic and cultural life. The project will integrate a variety of high-quality building materials, a cohesive color palette, balanced articulation, and landscaping, to create an inviting and comfortable residence for its users while also the recognizing and respecting the surrounding community. Thus, the project meets the intent of the Downtown Design Guide.

As shown in the case file, the project is consistent with the applicable Community Plan designation and policies and all applicable zoning designations and regulations.

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

The subject site is wholly within the City of Los Angeles, on a site that is approximately 0.508 acres. The surrounding area is characterized by level topography, improved streets, and residential and commercial development. Two properties directly north, across Cameron Lane (20-foot alley), are zoned C2-2D-O-SN and developed with an approximately 42,136 square foot apartment building with commercial uses on the ground floor (Tiny Art Gallery, Urban Elegance 23) and an approximately 92,849 square foot apartment building with swimming pool (City Lights on Figueroa Apartments). Two properties directly east, across Flower Street, are zoned C2-2D-O and developed with an approximately 7,500 square foot building used for parking and an approximately 6,890 square foot one-story light manufacturing building (Architects Corner, Grid Alternatives Greater Los Angeles). The property to the south is zoned C2-2D-O and developed with an approximately 7,025 square-foot, one-story warehouse building. Two properties directly west, across Lebanon Street (20-foot alley), are zoned C2-2D-O and developed with an approximately 0.356-acre surface parking lot.

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

The site is previously disturbed and surrounded by development. Therefore, it is not, and has no value as, a habitat for endangered, rare, or threatened species. According to the Tree Report prepared by The Tree Resource on May 1, 2022 (Attachment A), there are no trees or shrubs on the site that would be considered either protected or non-protected within the City of Los Angeles Native Tree Protection Ordinance. There is one tree located in the parkway perimeter considered a City of Los Angeles Street Tree that will receive no impact and will be retained and protected in place.

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

Traffic. A significant traffic/transportation impact may occur if a project conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. The project does not exceed the threshold criteria established by LADOT for preparing a transportation study. Per Section 2.2.3 of the City of Los Angeles Transportation Assessment Guidelines, a development project will have a potential vehicle miles traveled (VMT) impact if it generates a household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) in which the project is located (for residential projects) or if it generates a work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located (for office projects). For mixed use projects, the project VMT impact should be considered significant if any one of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. For the Central APC, the VMT impact criteria applicable to the project is 6.0 daily household VMT per capita and 7.6 daily work VMT per employee.

A Traffic Impact Analysis by Linscott, Law, & Greenspan, Engineers dated May 31, 2018 (and revised in an Addendum Traffic Analysis dated May 14, 2021) (Attachment B) concluded that the project would not exceed the LADOT VMT Thresholds. The analysis used the City of Los

Angeles VMT Calculator to estimate the proposed project will have a daily household VMT per capita of 4.2 and an estimated daily work VMT per employee of 7.4—lower than the respective 6.0 and 7.6 thresholds. Therefore, the project will not have any significant impacts to traffic or transportation.

Noise. A significant impact would occur if the proposed project would result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan, Noise Ordinances, or applicable standards of other agencies. The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574 and any subsequent ordinances which prohibit the emission or creation of noise beyond certain levels. The Ordinances cover both operational noise levels (i.e. post-construction), as well as any noise impact during construction. Section 41.40 of the LAMC regulates noise from demolition and construction activities, and 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 6:00 p.m. and 8:00 a.m. on Saturdays and holidays; all such activities are also prohibited on Sundays. Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the city or within 500 feet thereof. As the project is required to comply with the above ordinances and regulations, it will not result in any significant noise impacts. All construction-related noise impacts would be less than significant and temporary in nature.

Further, a Noise Technical Report (Attachment C) that was prepared by CAJA Environmental Services, LLC in June 2020 and revised in September 2021 concluded that no significant permanent operational or cumulative noise impacts are expected as a result of the proposed project and that no mitigation measures are necessary.

Air Quality. The South Coast Air Quality Management District (SCAQMD) is the agency primarily responsible for comprehensive air pollution control in the South Coast Air Basin and for reducing emissions from area, point stationary, mobile, and indirect sources. SCAQMD's 2022 Air Quality Management Plan (AQMP) contains projections for achieving state and federal air quality goals that are based on population, housing, and employment trend assumptions in SCAG's 2020-2045 RTP/SCS, which are themselves largely based on local growth forecasts from local governments like the City of Los Angeles. A significant air quality impact may occur if a project is inconsistent with the AQMP or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of the plan.

An Air Quality Study (Attachment D) prepared by CAJA Environmental Services, LLC in June 2020 and revised June 2021 assessed four thresholds:

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

b) Would the project 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

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

Regarding Threshold A, the study found that the project's development would not result in growth or accompanying emissions that are unaccounted for by the 2020-2045 RTP/SCS and the 2022 AQMP, and that the project would be consistent with the applicable policies of the Air Quality Element. As a result, the project's impact with respect to Threshold A would be less than significant. Regarding Threshold B, the study concluded that the project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NOX, CO, SOX, PM10, or PM2.5. Local emissions also would not exceed SCAQMD LSTs for NOX, CO, PM10, or PM2.5. As a result, the project's construction-related emissions impacts on regional and localized air quality would be less than significant. Regarding Threshold C, the study stated that emissions from the project's construction and operations are expected to have a less than significant health risk impact, and that the project's potential to expose sensitive receptors to substantial CO concentrations would be less than significant. Regarding Threshold D, the study concluded that the project would not result in activities that create objectionable odors, and that no impact would occur.

Water Quality. A significant impact would occur if the project would: 1) exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board (LARWQCB); 2) increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded; or 3) increase surface water runoff, resulting in the need for expanded off-site storm water drainage facilities. All wastewater from the project would be treated according to requirements of the National Pollutant Discharge Elimination System (NPDES) permit authorized by the LARWQCB. Therefore, the proposed project would result in a less than significant impact related to wastewater treatment requirements.

The project will be subject to Regulatory Compliance Measures (RCMs), which require compliance with City of Los Angeles pollutant discharge, dewatering, and stormwater mitigations, and Best Management Practices for stormwater runoff. Prior to any construction activities, the project applicant would be required to coordinate with the City of Los Angeles Bureau of Sanitation (BOS) to determine the exact wastewater conveyance requirements of the proposed project, and to undertake any upgrades to the wastewater lines in the vicinity of the project site that are needed to adequately serve the proposed project. Therefore, the proposed project would not result in a significant impact related to water or wastewater infrastructure.

Lastly, development of the proposed project would maintain existing drainage patterns. Site generated surface water runoff would continue to flow to the City's storm drain system. The proposed project would not create or contribute to runoff water that would exacerbate any existing deficiencies in the storm drain system or provide substantial additional sources of polluted runoff. As such, the proposed project would not result in a significant impact related to existing storm drain capacities.

(e) The proposed project has been reviewed by City staff and can be adequately served by all required utilities and public services.

The site is currently and adequately served by the City's Department of Water and Power, the City's Bureau of Sanitation, the Southern California (SoCal) Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, Los Angeles Unified School District, Los Angeles Public Library, and other public services. These utilities and public

services have continuously served the area for the past several decades. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes, which are required of all projects, it can be anticipated that the proposed project will not create any substantial impact on existing utilities and public services.

In addition, roof and site drainage and sewer availability must comply with Bureau of Engineering and Bureau of Sanitation standards. Hydrants, Fire Department Access, and Fire Safety must also be reviewed and approved by the Los Angeles Fire Department before permits can be issued. Furthermore, the project must comply with all City Regulatory Compliance Measures (RCMs) that apply. Therefore, the project site will be adequately served by all public utilities and services.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

There are five (5) Exceptions which must be considered to find a project exempt under Class 32: (a) Cumulative Impacts; (b) Significant Effect; (c) Scenic Highways; (d) Hazardous Waste Sites; and (e) Historical Resources.

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

The project is located at 1323 South Flower Street (1323-1331 South Flower Street) within the Central City Community Plan. There are currently four projects located within a quarter mile of the subject project. Two are currently filed and pending approval from the Department of City Planning, and two are under construction with estimated completion dates in 2024. Although those projects are located in close proximity to the subject project, it is unlikely that they would have the same construction schedule which may create cumulative construction impacts.

PROJECTS WITHIN A QUARTER-MILE OF THE SUBJECT SITE
(Filed or approved in the last 5 years)

Address	Case Number	Date Filed	Date Approved	Scope of Work
1220 S. Hope Street	ZA-2018-2293-MCUP-CUX-ZV-ZAD-SPR	04/23/2018	Pending[1]	Adaptive reuse: 100-unit, 473-guest room mixed-use expansion
1600 S. Flower Street	CPC-2018-3336-SN-TDR-CUB-ZV-WDI-SPR-MSC	06/11/2018	Pending[1]	New 300-guest room, 250-unit mixed-use towers
1317 S. Grand Avenue[2]	DIR-2019-7676-TDR-TOC-SPR-WDI	12/23/2019	08/19/2020	New 147-unit mixed-use building
1411 S. Flower Street[2]	DIR-2021-1011-TDR-TOC-SPR-WDI-VHCA	02/04/2021	10/15/2021	New 227-unit residential building

[1] Currently being processed by the Los Angeles Department of City Planning.

[2] Under construction. Estimated completion 2024.

According to SCAQMD, individual construction projects that do not exceed the SCAQMD's recommended daily thresholds for project-specific impacts would not cause a cumulatively

considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Interim thresholds were developed by DCP staff based on CalEEMod model runs relying on reasonable assumptions and consulting with AQMD staff. An Air Quality Report prepared by CAJA Environmental Services, LLC in June 2020 and revised in June 2021 concluded that air emissions associated with the Project's construction and operations would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment. The project's contribution to cumulative construction- and operations-related regional emissions would not be cumulatively considerable and therefore would be less than significant.

A Noise Technical Report (Attachment C) was prepared in June 2020 and revised in September 2021 by CAJA Environmental Services, LLC. The report stated, "given the site's location in a dense urban environment and along a major arterial roadway, it is unlikely that noise from the current land use contributes substantially to surrounding ambient noise levels, which are primarily traffic-related." The Noise Study concluded that any on-site or off-site noise increases related to construction or operation would be below the respective threshold of significance. Therefore, the Project's cumulative noise impact would be less than significant.

According to the Traffic Impact Analysis by Linscott, Law, & Greenspan, Engineers (Attachment B) that was introduced previously, the proposed project will have a daily household VMT per capita of 4.2 and an estimated daily work VMT per employee of 7.4. Since the estimated household and work VMT are lower than the respective 6.0 and 7.6 thresholds, no cumulative VMT impacts are anticipated.

As mentioned previously, the proposed project is subject to Regulatory Compliance Measures (RCMs) related to air quality, noise, hazardous materials, geology, water quality and transportation respectively. Those RCMs would ensure the project impacts are less than significant. Since the project impacts are less than significant, the project's contribution to cumulative impacts would not be cumulatively considerable and therefore would be less than significant.

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

As mentioned, the project proposes a 48-unit, 100-guest room building with 12,676 square feet of interior and exterior restaurant in an area zoned and designated for such development. The project proposes a FAR of 5.22:1 which exceeds the maximum 3:1 FAR otherwise permitted by the C2-2D-O zoning in conjunction with a 2.22 FAR increase through a Transfer of Floor Area Rights (TFAR). The proposed building is 11 stories, with at-grade and subterranean parking levels on a site that is currently developed with a two-story light manufacturing building used for parking. All surrounding lots are developed with commercial and multi-family buildings. Two properties directly north, across Cameron Lane, are zoned C2-2D-O-SN and developed with an approximately 42,136 square-foot apartment building with ground floor commercial uses and an approximately 92,849 square-foot apartment building with a swimming pool. The proposed building will not be unusual for the vicinity of the subject site and will be similar in scope to future residential buildings in the area. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

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

highway.

As it relates to development along a Scenic Highway, the only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. State Route 27 is located approximately 20 miles to the west of the subject property. Therefore, the subject site will not create any impacts within a designated state scenic highway.

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

According to Envirostor, the State of California's database of Hazardous Waste Sites, neither the subject site, nor any site in the vicinity, is identified as a hazardous waste site. As such, the project would not be developed on a site identified as a hazardous site pursuant to Section 65962.5 of the Government Code.

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

The project site has not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register; and was not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. The Department of City Planning, Office of Historic Resources confirmed that the existing building is not considered historic for the purposes of CEQA per an email dated July 29, 2020. The project will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.

Conclusion

The proposed project involves the demolition of the existing 31,000 square-foot light manufacturing building currently used for parking, and the construction, use and maintenance of an 11-story mixed-use building containing 117,794 square feet of floor area, including 100 hotel guest rooms, and 48 market-rate residential units, 9,585 square feet of indoor restaurant space and 3,091 square feet of outdoor terrace restaurant space. The project is compatible with the surrounding commercial, residential, warehouse, and entertainment uses, and is consistent with the General Plan designation, zoning, and requirements of the LAMC. The project will have a less than significant impact on traffic, noise, air quality and water quality in the surrounding neighborhood. The project is in an urbanized area and thus will be adequately served by public utilities and services.

Since the project meets all the requirements of the categorical exemption set forth by CEQA Guidelines Section 15332 (Class 32 Exemption) and none of the applicable exceptions in Section 15302.2 to the use of the exemption apply to the project, it is appropriate to determine this project is categorically exempt from the requirements of CEQA.

Attachments

Attachment A – Tree Report
Attachment B – Traffic Analysis
Attachment C – Noise Technical Report
Attachment D – Air Quality Study

TREE REPORT

PREPARED FOR

Elliot Tishbi, Tishbee's LLC

304 East 12th Street,

Los Angeles, CA 90023

PROPERTY

1323 S. Flower Street

Los Angeles, CA 90015

CONTACT

Nikhil Kamat

323.309.7334

nikhil@nklosures.com

May 1, 2022

PREPARED BY

LISA SMITH, **THE TREE RESOURCE ®**

REGISTERED CONSULTING ARBORIST #464

ISA BOARD CERTIFIED MASTER ARBORIST #WE3782B

ISA TREE RISK ASSESSOR QUALIFIED - INSTRUCTOR

MEMBER OF AMERICAN SOCIETY OF CONSULTING ARBORISTS

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TABLE OF CONTENTS

TREE REPORT

1323 S. Flower Street
Los Angeles, CA 90015

SUMMARY

PROJECT OVERVIEW	
Site Address	**1323 S. Flower Street, Los Angeles, CA 90015**
Location and/or Specific Plan	**Downtown**
Project Description	**Mixed-Use Development**
Number of Protected Trees on Site	**0**
Number of Recommended Removals	**0**

This Tree Report was prepared at the request of the property owner, Tishbee's LLC, who is preparing to build a mixed-use development on this property. The subject property is 22,601 square feet and is located in the downtown area of Los Angeles. It is currently developed with a 31,000 square foot warehouse which the owner is preparing to demolish.

PROTECTED TREES, URBAN FORESTRY DIVISION

This property is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 186873. **Protected Trees** are defined by this ordinance as oaks (*Quercus* sp.) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica var. californica*); Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a diameter at breast height (DBH) of four inches (4") or greater. **Protected Shrubs** are defined as Mexican elderberry (*Sambucus mexicana*); Toyon (*Heteromeles arbutifolia*) which measure four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub.

There are NO trees or shrubs on this property that would be considered protected within the City of Los Angeles Native Tree Protection Ordinance.

NEIGHBOR TREES

I have also inspected the neighboring properties to confirm there are no protected tree species that are adjacent to the construction zone, or in areas of impact.

CITY OF LOS ANGELES STREET TREES, URBAN FORESTRY DIVISION

There is one (1) tree located in the parkway perimeter that are considered **City of Los Angeles Street Trees.** This tree will receive no impact and will be retained and protected in place.

NON-PROTECTED SIGNIFICANT TREES, DEPARTMENT OF CITY PLANNING

The Department of City Planning requires the identification of the location, size, type and condition of all existing trees on the site with a DBH of 8 inches (8") or greater. These trees will be identified as **Non-Protected Significant Trees.**

There are NO trees that would be considered non-protected significant on the property.

ASSIGNMENT

The Assignment included:

- Field Observation and Inventory of Trees on Site
- Photographs of the subject trees are included in Appendix B
- Evaluation of potential construction impacts
- Matrix of proposed tree removals and trees to remain

LIMITS OF THE ASSIGNMENT

The field inspection was a visual, grade level tree assessment. No special tools or equipment were used. No tree risk assessments were performed. My site examination and the information in this report is limited to the date and time the inspection occurred. The information in this report is limited to the condition of the trees at the time of my inspection.

TREE CHARACTERISTICS AND SITE CONDITIONS

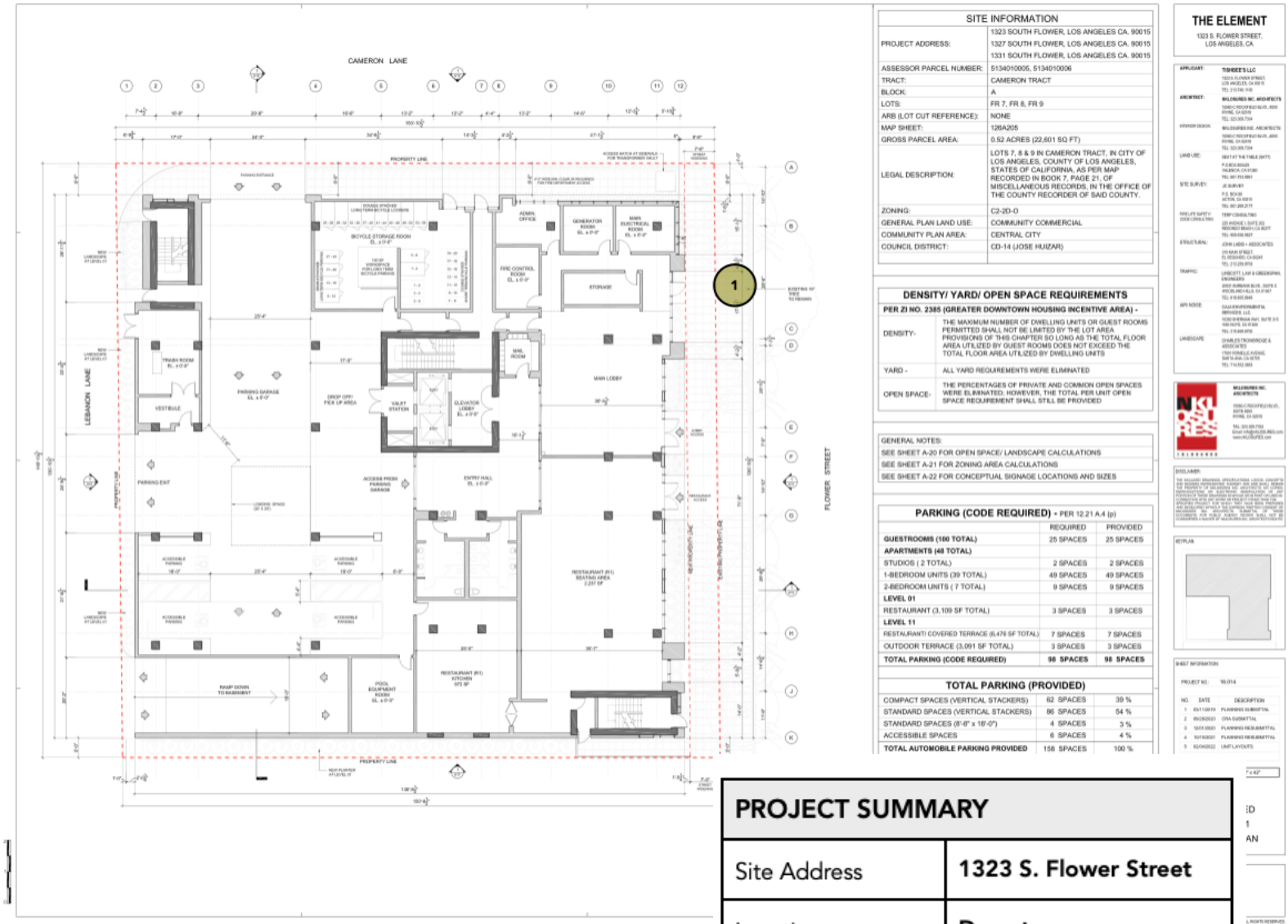
Detailed information with respect to size, condition, species and recommendations are included in the Summary of Field Inspections in Appendix C. The trees are numbered on the Tree Location Map in Appendix A.

IMPACT ANALYSIS AND SPECIFIC RECOMMENDATIONS

STREET TREES

One (1) City of Los Angeles Street Tree ficus #1 located in the parkway perimeter will receive no impact and will be retained and protected in place.

APPENDIX A - TREE LOCATION MAP, REDUCED



SITE INFORMATION	
PROJECT ADDRESS:	1323 SOUTH FLOWER, LOS ANGELES CA. 90015 1327 SOUTH FLOWER, LOS ANGELES CA. 90015 1331 SOUTH FLOWER, LOS ANGELES CA. 90015
ASSESSOR PARCEL NUMBER:	5134010005, 5134010006
TRACT:	CAMERON TRACT
BLOCK:	A
LOTS:	FR 7, FR 8, FR 9
ARB (LOT CUT REFERENCE):	NONE
MAP SHEET:	126A205
GROSS PARCEL AREA:	0.52 ACRES (22,601 SQ FT)
LEGAL DESCRIPTION:	LOTS 7, 8 & 9 IN CAMERON TRACT, IN CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATES OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 7, PAGE 21, OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.
ZONING:	C2-2D-O
GENERAL PLAN LAND USE:	COMMUNITY COMMERCIAL
COMMUNITY PLAN AREA:	CENTRAL CITY
COUNCIL DISTRICT:	CD-14 (JOSE HUIZAR)

DENSITY/ YARD/ OPEN SPACE REQUIREMENTS	
PER ZI NO. 2385 (GREATER DOWNTOWN HOUSING INCENTIVE AREA) -	
DENSITY-	THE MAXIMUM NUMBER OF DWELLING UNITS OR GUEST ROOMS PERMITTED SHALL NOT BE LIMITED BY THE LOT AREA PROVISIONS OF THIS CHAPTER SO LONG AS THE TOTAL FLOOR AREA UTILIZED BY GUEST ROOMS DOES NOT EXCEED THE TOTAL FLOOR AREA UTILIZED BY DWELLING UNITS
YARD -	ALL YARD REQUIREMENTS WERE ELIMINATED
OPEN SPACE-	THE PERCENTAGES OF PRIVATE AND COMMON OPEN SPACES WERE ELIMINATED; HOWEVER, THE TOTAL PER UNIT OPEN SPACE REQUIREMENT SHALL STILL BE PROVIDED

GENERAL NOTES:
SEE SHEET A-20 FOR OPEN SPACE/ LANDSCAPE CALCULATIONS
SEE SHEET A-21 FOR ZONING AREA CALCULATIONS
SEE SHEET A-22 FOR CONCEPTUAL SIGNAGE LOCATIONS AND SIZES

PARKING (CODE REQUIRED) - PER 12.21 A.4 (p)	REQUIRED	PROVIDED
GUESTROOMS (100 TOTAL)	25 SPACES	25 SPACES
APARTMENTS (48 TOTAL)		
STUDIOS (2 TOTAL)	2 SPACES	2 SPACES
1-BEDROOM UNITS (39 TOTAL)	49 SPACES	49 SPACES
2-BEDROOM UNITS (7 TOTAL)	9 SPACES	9 SPACES
LEVEL 01		
RESTAURANT (3,109 SF TOTAL)	3 SPACES	3 SPACES
LEVEL 11		
RESTAURANT/ COVERED TERRACE (6,476 SF TOTAL)	7 SPACES	7 SPACES
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TOTAL PARKING (CODE REQUIRED)	98 SPACES	98 SPACES

TOTAL PARKING (PROVIDED)		
COMPACT SPACES (VERTICAL STACKERS)	62 SPACES	39 %
STANDARD SPACES (VERTICAL STACKERS)	86 SPACES	54 %
STANDARD SPACES (8'-8" x 18'-0")	4 SPACES	3 %
ACCESSIBLE SPACES	6 SPACES	4 %
TOTAL AUTOMOBILE PARKING PROVIDED	158 SPACES	100 %

THE ELEMENT
1323 S. FLOWER STREET,
LOS ANGELES, CA

PROJECT SUMMARY	
Site Address	**1323 S. Flower Street**
Location	**Downtown**
Project Description	**Mixed-Use Development**

KEY

Street Tree

APPENDIX B - PHOTOGRAPHS

PHOTO 1 - One (1) City of Los Angeles Street Tree ficus #1 located in the parkway perimeter will receive no impact and will be retained and protected in place.

APPENDIX B - PHOTOGRAPHS

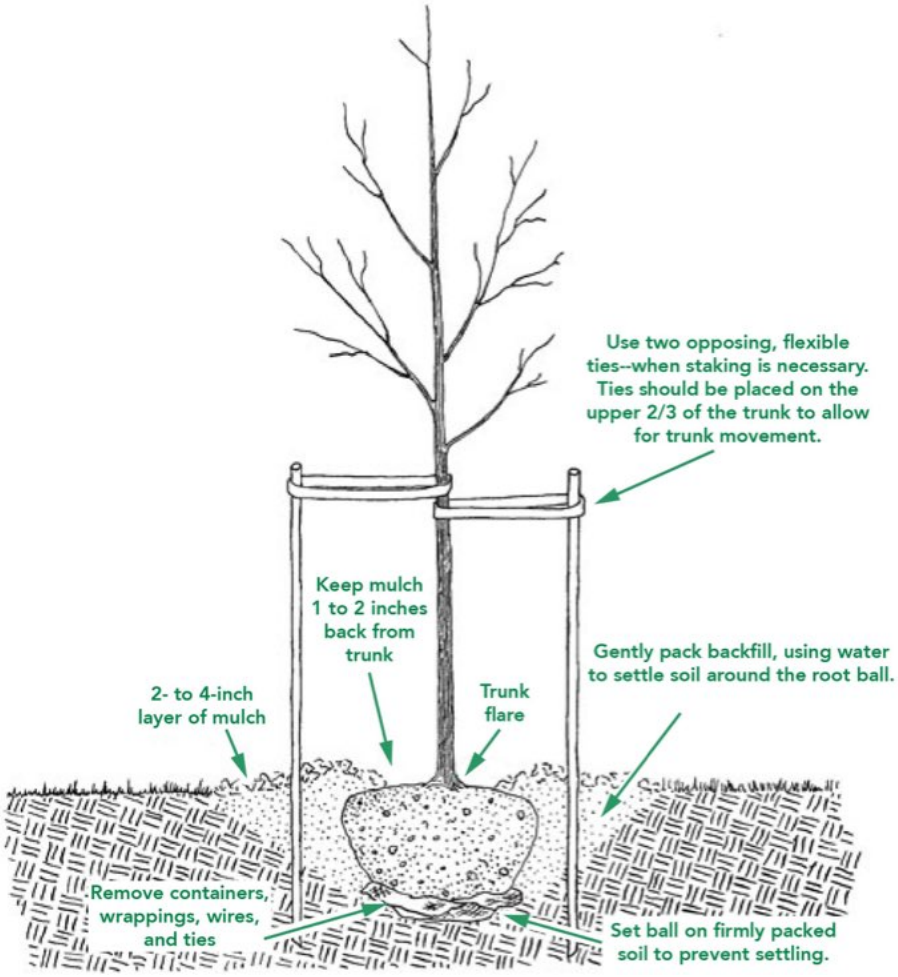
PHOTO 2 - One (1) City of Los Angeles Street Tree ficus #1 located in the parkway perimeter will receive no impact and will be retained and protected in place.

APPENDIX C - SUMMARY OF FIELD INSPECTION

Rating Code: A = Excellent, B = Good, C = Fair, D = Poor, E = Nearly Dead, F = Dead

Tree #	Species	Status	DBH (")	Height (')	Spread (')	Summary of Condition	Retain or Remove
1	Indian Laurel Fig *Ficus mircocarpa nitida*	Street	17.5	30	25	C	Retain

NEW TREE PLANTING



The ideal time to plant trees and shrubs is during the dormant season, in the fall after leaf drop or early spring before budbreak. Weather conditions are cool and allow plants to establish roots in the new location before spring rains and summer heat stimulate new top growth. Before you begin planting your tree, be sure you have had all underground utilities located prior to digging.

If the tree you are planting is balled or bare root, it is important to understand that its root system has been reduced by 90 to 95 percent of its original size during transplanting. As a result of the trauma caused by the digging process, trees commonly exhibit what is known as transplant shock. Containerized trees may also experience transplant shock, particularly if they have circling roots that must be cut. Transplant shock is indicated by slow growth and reduced vigor following transplanting. Proper site preparation before and during planting coupled with good follow-up care reduces the amount of time the plant experiences transplant shock and allows the tree to quickly establish in its new location. Carefully follow nine simple steps, and you can significantly reduce the stress placed on the plant at the time of planting.

NEW TREE PLANTING, continued

1. Dig a shallow, broad planting hole. Make the hole wide, as much as three times the diameter of the root ball but only as deep as the root ball. It is important to make the hole wide because the roots on the newly establishing tree must push through surrounding soil in order to establish. On most planting sites in new developments, the existing soils have been compacted and are unsuitable for healthy root growth. Breaking up the soil in a large area around the tree provides the newly emerging roots room to expand into loose soil to hasten establishment.

2. Identify the trunk flare. The trunk flare is where the roots spread at the base of the tree. This point should be partially visible after the tree has been planted (see diagram). If the trunk flare is not partially visible, you may have to remove some soil from the top of the root ball. Find it so you can determine how deep the hole needs for proper planting.

3. Remove tree container for containerized trees. Carefully cutting down the sides of the container may make this easier. Inspect the root ball for circling roots and cut or remove them. Expose the trunk flare, if necessary.

4. Place the tree at the proper height. Before placing the tree in the hole, check to see that the hole has been dug to the proper depth and no more. The majority of the roots on the newly planted tree will develop in the top 12 inches of soil. If the tree is planted too deeply, new roots will have difficulty developing because of a lack of oxygen. It is better to plant the tree a little high, 1-2 inches above the base of the trunk flare, than to plant it at or below the original growing level. This planting level will allow for some settling.

5. Straighten the tree in the hole. Before you begin backfilling, have someone view the tree from several directions to confirm that the tree is straight. Once you begin backfilling, it is difficult to reposition the tree.

6. Fill the hole gently but firmly. Fill the hole about one-third full and gently but firmly pack the soil around the base of the root ball. Be careful not to damage the trunk or roots in the process. Fill the remainder of the hole, taking care to firmly pack soil to eliminate air pockets that may cause roots to dry out. To avoid this problem, add the soil a few inches at a time and settle with water. Continue this process until the hole is filled and the tree is firmly planted. It is not recommended to apply fertilizer at time of planting.

7. Stake the tree, if necessary. If the tree is grown properly at the nursery, staking for support will not be necessary in most home landscape situations. Studies have shown that trees establish more quickly and develop stronger trunk and root systems if they are not staked at the time of planting. However, protective staking may be required on sites where lawn mower damage, vandalism, or windy conditions are concerns. If staking is necessary for support, there are three methods to choose among: staking, guying, and ball stabilizing. One of the most common methods is staking. With this method, two stakes used in conjunction with a wide, flexible tie material on the lower half of the tree will hold the tree upright, provide flexibility, and minimize injury to the trunk (see diagram). Remove support staking and ties after the first year of growth.

8. Mulch the base of the tree. Mulch is simply organic matter applied to the area at the base of the tree. It acts as a blanket to hold moisture, it moderates soil temperature extremes, and it reduces competition from grass and weeds. A 2- to 3-inch layer is ideal. More than 3 inches may cause a problem with oxygen and moisture levels. When placing mulch, be sure that the actual trunk of the tree is not covered. Doing so may cause decay of the living bark at the base of the tree. A mulch-free area, 1 to 2 inches wide at the base of the tree, is sufficient to avoid moist bark conditions and prevent decay.

TREE MAINTENANCE AND PRUNING

Some trees do not generally require pruning. The occasional removal of dead twigs or wood is typical. Occasionally a tree has a defect or structural condition that would benefit from pruning. Any pruning activity should be performed under the guidance of a certified arborist or tree expert.

Because each cut has the potential to change the growth of the tree, no branch should be removed without a reason. Common reasons for pruning are to remove dead branches, to remove crowded or rubbing limbs, and to eliminate hazards. Trees may also be pruned to increase light and air penetration to the inside of the tree's crown or to the landscape below. In most cases, mature trees are pruned as a corrective or preventive measure.

Routine thinning does not necessarily improve the health of a tree. Trees produce a dense crown of leaves to manufacture the sugar used as energy for growth and development. Removal of foliage through pruning can reduce growth and stored energy reserves. Heavy pruning can be a significant health stress for the tree.

Yet if people and trees are to coexist in an urban or suburban environment, then we sometimes have to modify the trees. City environments do not mimic natural forest conditions. Safety is a major concern. Also, we want trees to complement other landscape plantings and lawns. Proper pruning, with an understanding of tree biology, can maintain good tree health and structure while enhancing the aesthetic and economic values of our landscapes.

Pruning Techniques – From the I.S.A. Guideline

Specific types of pruning may be necessary to maintain a mature tree in a healthy, safe, and attractive condition.

Cleaning is the removal of dead, dying, diseased, crowded, weakly attached, and low- vigor branches from the crown of a tree.

Thinning is the selective removal of branches to increase light penetration and air movement through the crown. Thinning opens the foliage of a tree, reduces weight on heavy limbs, and helps retain the tree's natural shape.

Raising removes the lower branches from a tree to provide clearance for buildings, vehicles, pedestrians, and vistas.

Reduction reduces the size of a tree, often for clearance for utility lines. Reducing the height or spread of a tree is best accomplished by pruning back the leaders and branch terminals to lateral branches that are large enough to assume the terminal roles (at least one-third the diameter of the cut stem). Compared to topping, reduction helps maintain the form and structural integrity of the tree.

TREE MAINTENANCE AND PRUNING, continued

How Much Should Be Pruned?

Mature trees should require little routine pruning. A widely accepted rule of thumb is never to remove more than one-quarter of a tree's leaf-bearing crown. In a mature tree, pruning even that much could have negative effects. Removing even a single, large- diameter limb can create a wound that the tree may not be able to close. The older and larger a tree becomes, the less energy it has in reserve to close wounds and defend against decay or insect attack. Pruning of mature trees is usually limited to removal of dead or potentially hazardous limbs.

Wound Dressings

Wound dressings were once thought to accelerate wound closure, protect against insects and diseases, and reduce decay. However, research has shown that dressings do not reduce decay or speed closure and rarely prevent insect or disease infestations. Most experts recommend that wound dressings not be used.

DISEASES AND INSECTS

Continual observation and monitoring of your tree can alert you to any abnormal changes. Some indicators are: excessive leaf drop, leaf discoloration, sap oozing from the trunk and bark with unusual cracks. Should you observe any changes, you should contact a Tree specialist or Certified Arborist to review the tree and provide specific recommendations. Trees are susceptible to hundreds of pests, many of which are typical and may not cause enough harm to warrant the use of chemicals. However, diseases and insects may be indication of further stress that should be identified by a professional.

GRADE CHANGES

The growing conditions and soil level of trees are subject to detrimental stress should they be changed during the course of construction. Raising the grade at the base of a tree trunk can have long-term negative consequences. This grade level should be maintained throughout the protected zone. This will also help in maintaining the drainage in which the tree has become accustomed.

INSPECTION

The property owner should establish an inspection calendar based on the recommendation provided by the tree specialist. This calendar of inspections can be determined based on several factors: the maturity of the tree, location of tree in proximity to high-use areas vs. low-use area, history of the tree, prior failures, external factors (such as construction activity) and the perceived value of the tree to the homeowner.

Assumptions and Limiting Conditions

No warranty is made, expressed or implied, that problems or deficiencies of the trees or the property will not occur in the future, from any cause. The Consultant shall not be responsible for damages or injuries caused by any tree defects, and assumes no responsibility for the correction of defects or tree related problems.

The owner of the trees may choose to accept or disregard the recommendations of the Consultant, or seek additional advice to determine if a tree meets the owner's risk abatement standards.

The Consulting Arborist has no past, present or future interest in the removal or retaining of any tree. Opinions contained herein are the independent and objective judgments of the consultant relating to circumstances and observations made on the subject site.

The recommendations contained in this report are the opinions of the Consulting Arborist at the time of inspection. These opinions are based on the knowledge, experience, and education of the Consultant. The field inspection was a visual, grade level tree assessment.

The Consulting Arborist shall not be required to give testimony, perform site monitoring, provide further documentation, be deposed, or to attend any meeting without subsequent contractual arrangements for this additional employment, including payment of additional fees for such services as described by the Consultant.

The Consultant assumes no responsibility for verification of ownership or locations of property lines, or for results of any actions or recommendations based on inaccurate information.

This Arborist report may not be reproduced without the express permission of the Consulting Arborist and the client to whom the report was issued. Any change or alteration to this report invalidates the entire report.

Should you have any further questions regarding this property, please contact me at (310) 663-2290.

Respectfully submitted,

Lisa Smith

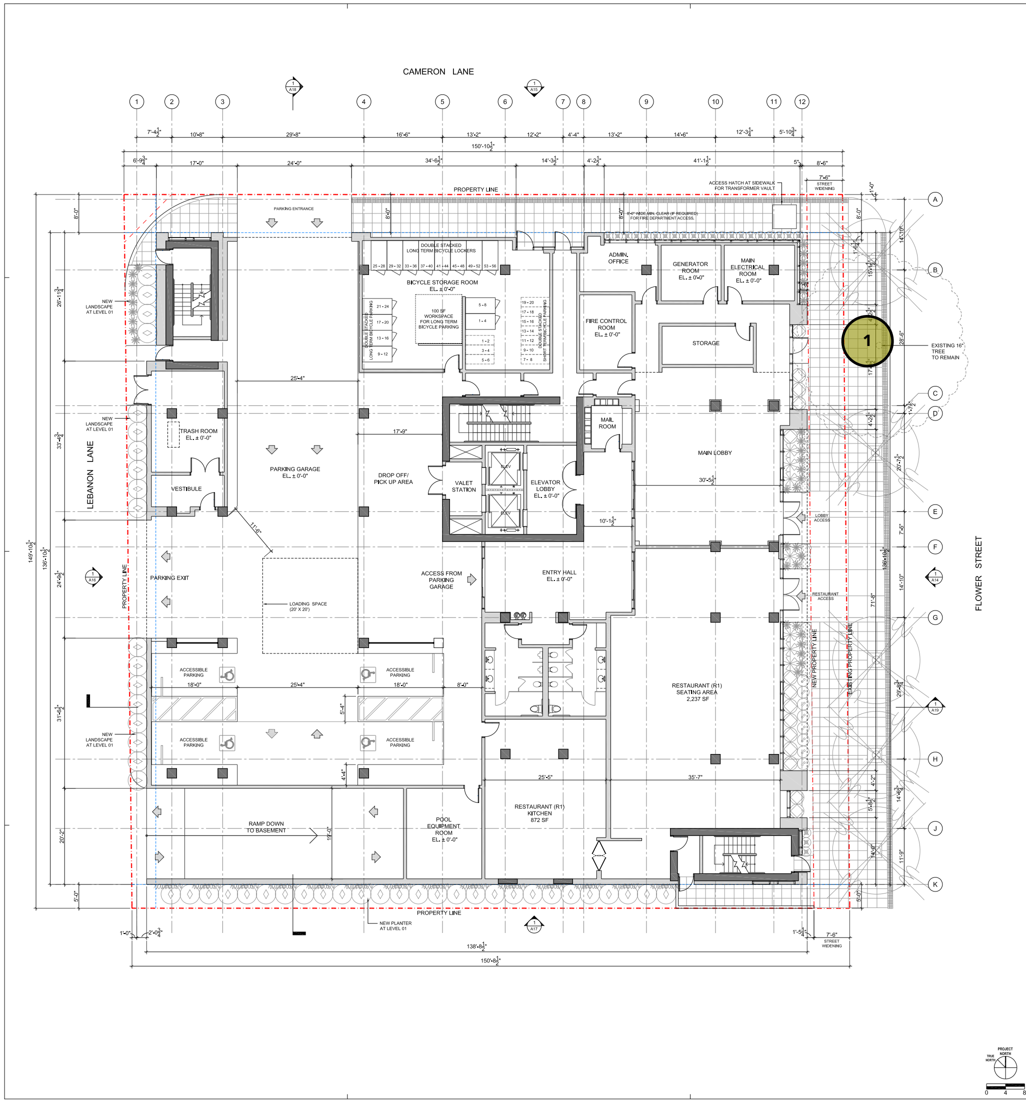
Registered Consulting Arborist #464
ISA Board Certified Master Arborist #WE3782B
ISA Tree Risk Assessor Qualified- Instructor
American Society of Consulting Arborists, Member

Appendix A: Tree Locations on Project Site Plan

PROJECT SUMMARY	
Site Address	**1323 S. Flower Street**
Location	**Downtown**
Project Description	**Mixed-Use Development**

KEY

Street Tree



SITE INFORMATION	
PROJECT ADDRESS:	1323 SOUTH FLOWER, LOS ANGELES CA. 90015 1327 SOUTH FLOWER, LOS ANGELES CA. 90015 1331 SOUTH FLOWER, LOS ANGELES CA. 90015
ASSESSOR PARCEL NUMBER:	5134010005, 5134010006
TRACT:	CAMERON TRACT
BLOCK:	A
LOTS:	FR 7, FR 8, FR 9
ARB (LOT CUT REFERENCE):	NONE
MAP SHEET:	126A205
GROSS PARCEL AREA:	0.52 ACRES (22,601 SQ FT)
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ZONING:	C2-2D-O
GENERAL PLAN LAND USE:	COMMUNITY COMMERCIAL
COMMUNITY PLAN AREA:	CENTRAL CITY
COUNCIL DISTRICT:	CD-14 (JOSE HUIZAR)

DENSITY/ YARD/ OPEN SPACE REQUIREMENTS	
PER ZI NO. 2385 (GREATER DOWNTOWN HOUSING INCENTIVE AREA) -	
DENSITY-	THE MAXIMUM NUMBER OF DWELLING UNITS OR GUEST ROOMS PERMITTED SHALL NOT BE LIMITED BY THE LOT AREA PROVISIONS OF THIS CHAPTER SO LONG AS THE TOTAL FLOOR AREA UTILIZED BY GUEST ROOMS DOES NOT EXCEED THE TOTAL FLOOR AREA UTILIZED BY DWELLING UNITS
YARD -	ALL YARD REQUIREMENTS WERE ELIMINATED
OPEN SPACE-	THE PERCENTAGES OF PRIVATE AND COMMON OPEN SPACES WERE ELIMINATED; HOWEVER, THE TOTAL PER UNIT OPEN SPACE REQUIREMENT SHALL STILL BE PROVIDED

GENERAL NOTES:
SEE SHEET A-20 FOR OPEN SPACE/ LANDSCAPE CALCULATIONS
SEE SHEET A-21 FOR ZONING AREA CALCULATIONS
SEE SHEET A-22 FOR CONCEPTUAL SIGNAGE LOCATIONS AND SIZES

PARKING (CODE REQUIRED) - PER 12.21 A.4 (p)

	REQUIRED	PROVIDED
GUESTROOMS (100 TOTAL)	25 SPACES	25 SPACES
APARTMENTS (48 TOTAL)		
STUDIOS (2 TOTAL)	2 SPACES	2 SPACES
1-BEDROOM UNITS (39 TOTAL)	49 SPACES	49 SPACES
2-BEDROOM UNITS (7 TOTAL)	9 SPACES	9 SPACES
LEVEL 01		
RESTAURANT (3,109 SF TOTAL)	3 SPACES	3 SPACES
LEVEL 11		
RESTAURANT/ COVERED TERRACE (6,476 SF TOTAL)	7 SPACES	7 SPACES
OUTDOOR TERRACE (3,091 SF TOTAL)	3 SPACES	3 SPACES
TOTAL PARKING (CODE REQUIRED)	**98 SPACES**	**98 SPACES**

TOTAL PARKING (PROVIDED)

COMPACT SPACES (VERTICAL STACKERS)	62 SPACES	39 %
STANDARD SPACES (VERTICAL STACKERS)	86 SPACES	54 %
STANDARD SPACES (8'-8" x 18'-0")	4 SPACES	3 %
ACCESSIBLE SPACES	6 SPACES	4 %
TOTAL AUTOMOBILE PARKING PROVIDED	158 SPACES	100 %

BICYCLE PARKING (CODE REQUIRED) PER 12.21.A.16

	SHORT TERM		LONG TERM	
	REQUIRED	PROVIDED	REQUIRED	PROVIDED
GUESTROOMS (100 TOTAL)	10	10	10	10
APARTMENTS (48 TOTAL)	4	4	40	40
RESTAURANTS (12,676 SF TOTAL)	6	6	6	6
TOTAL BICYCLE PARKING	**20**	**20**	**56**	**56**

* 20 SHORT TERM AND 56 LONG TERM BICYCLE PARKING SPACES PROVIDED

THE ELEMENT
1323 S. FLOWER STREET, LOS ANGELES, CA

APPLICANT:	TISHBEE'S LLC 1323 S. FLOWER STREET, LOS ANGELES, CA 90015 TEL: 213.746.1100
ARCHITECT:	NKLOSURES INC. ARCHITECTS 15560-C ROCKFIELD BLVD., #200 IRVINE, CA 92618 TEL: 323.309.7334
INTERIOR DESIGN:	NKLOSURES INC. ARCHITECTS 15560-C ROCKFIELD BLVD., #200 IRVINE, CA 92618 TEL: 323.309.7334
LAND USE:	SEAT AT THE TABLE (SATT) P.O.BOX 800429 VALENCIA, CA 91380 TEL: 661.753.9861
SITE SURVEY:	JC SURVEY P.O. BOX 86 ACTON, CA 93510 TEL: 661.269.2177
FIRE LIFE SAFETY/ CODE CONSULTING:	TERP CONSULTING 225 AVENUE I, SUITE 202 REDONDO BEACH, CA 90277 TEL: 909.636.9827
STRUCTURAL:	JOHN LABIB + ASSOCIATES 319 MAIN STREET, EL SEGUNDO, CA 90245 TEL: 213.239.9703
TRAFFIC:	LINSCOTT, LAW & GREENSPAN, ENGINEERS 20931 BURBANK BLVD., SUITE C WOODLAND HILLS, CA 91367 TEL: 818.835.8648
AIR/ NOISE:	CAJA ENVIRONMENTAL SERVICES, LLC. 15350 SHERMAN WAY, SUITE 315 VAN NUYS, CA 91406 TEL: 310.469.6700
LANDSCAPE:	CHARLES TROWBRIDGE & ASSOCIATES 17901 ROMELLE AVENUE, SANTA ANA, CA 92705 TEL: 714.532.3663

NKLOSURES INC. ARCHITECTS
15560-C ROCKFIELD BLVD., SUITE #200
IRVINE, CA 92618
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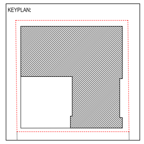
Email: Info@nKLOSURES.com
www.nKLOSURES.com

KEYPLAN:



SHEET INFORMATION:

PROJECT NO.: 16.014

NO.	DATE	DESCRIPTION
1	03/11/2019	PLANNING SUBMITTAL
2	09/28/2020	CRA SUBMITTAL
3	12/01/2020	PLANNING RESUBMITTAL
4	10/15/2021	PLANNING RESUBMITTAL
5	02/04/2022	UNIT LAYOUTS

FULL SIZE PRINT: 30" x 42"

SHEET NAME:
PROPOSED LEVEL 01 FLOOR PLAN

SCALE: 1/8" =1'-0"

SHEET NO.: A4

MEMORANDUM

To:	Eileen Hunt Los Angeles Department of Transportation	Date:	May 14, 2021
From:	David S. Shender, P.E. Jason A. Shender Linscott, Law & Greenspan, Engineers	LLG Ref:	5-17-0377-1
Subject:	**Traffic Analysis Addendum – 1323 S. Flower Street Mixed-Use Project**		

LINSCOTT LAW & GREENSPAN
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Transportation
Parking

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Pasadena
Irvine
San Diego
Woodland Hills

This memorandum has been prepared by Linscott, Law & Greenspan, Engineers (LLG) to provide an addendum traffic analysis for the proposed mixed-use project ("the Project") located at 1323 S. Flower Street in the City of Los Angeles, California (the "City"). For this Project, LLG previously prepared:

- A traffic impact study dated May 31, 2018 (the "2018 Original Traffic Study") for this Project based on the Los Angeles Department of Transportation (LADOT) *Transportation Impact Study Guidelines*, December 2016 (the "2016 Guidelines"). The development evaluated in the 2018 Original Traffic Study included a hotel that will provide 132 hotel guestrooms (plus ancillary dining facilities), 48 residential apartment dwelling units, and 3,685 square feet of rooftop restaurant/outdoor terrace space. The development evaluated in the 2018 Original Traffic Study proposed two-way site access points to the ground floor of the Project's parking garage from both Cameron Lane and Lebanon Street. Additionally, the development evaluated in the 2018 Original Traffic Study proposed an access point to the subterranean levels of the parking garage is provided along Lebanon Street, at the southwesterly portion of the Project Site. The findings of the 2018 Original Traffic Study were confirmed based on the LADOT traffic assessment letter dated July 10, 2018. The approved traffic study concluded that based on the 2016 Guidelines, the Project would not create a significant impact at any of the ten study intersections analyzed in the 2018 Original Traffic Study.

- An addendum traffic analysis dated June 4, 2020 (the "2020 Addendum Traffic Analysis"), which was prepared to evaluate the potential traffic impacts of a modified Project. The 2020 Addendum Analysis was prepared based on the *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines,* July 2019 (the "2019 TAG"). The development evaluated in the 2020 Addendum Traffic Analysis included a hotel that will provide 132 hotel guestrooms (plus ancillary dining facilities), 48 residential apartment dwelling units, and 3,548 square feet of rooftop restaurant/outdoor terrace space. The development evaluated in the 2020 Addendum Traffic Analysis included modified site access and proposed ingress to the ground floor of the parking garage from the Cameron Lane site access point, and egress from the ground floor of the parking garage from

Lebanon Street. Like the Project evaluated in the 2018 Original Traffic Study, an access point to the subterranean levels of the parking garage is provided along Lebanon Street, at the southwesterly portion of the Project Site in the Project evaluated in the 2020 Addendum Traffic Analysis. The findings of the 2020 Addendum Traffic Analysis were confirmed based on the LADOT traffic assessment letter dated June 18, 2020. The 2020 Addendum Traffic Analysis concluded that based on the 2019 TAG, the Project would not result in a significant Vehicle Miles Traveled (VMT) impact (Threshold T-2.1). The 2020 Addendum Traffic Analysis also concluded that the Project would show consistency with adopted plans and policies (Threshold T-1) and not result increase hazards due to a geometric design feature (Threshold T-3).

Subsequent to the preparation of the 2020 Addendum Traffic Analysis, the Project has been modified. The hotel component of the Project has been reduced from 132 guestrooms to 100 guestrooms (plus 3,109 square feet of ancillary ground-floor dining facilities). Additionally, the current Project will provide 6,476 square feet of rooftop restaurant space. No changes to the number of apartment dwelling units are proposed for the current Project. The revised Project will provide 158 vehicular parking spaces. Additionally, no changes to the Project's vehicular access points are proposed as part of the current Project. The site plan for the revised Project is illustrated in the attached ***Figure 1*****.**

It is noted that subsequent to the preparation of the 2020 Addendum Traffic Analysis, LADOT has published an updated version of the *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*[1] (the "TAG"). This addendum traffic analysis evaluates the trip generation potential of the current Project based on the updated development program and provides a VMT analysis for the current Project based on the TAG.

Project Trip Generation and Comparison

The trip generation forecast for the Project has been prepared using rates provided in the ITE *Trip Generation Manual*.[2]

Table 1 attached provides the updated trip generation forecast for the Project based on the modified development program. As shown in *Table 1*, the Project is forecast to generate 57 net new vehicle trips (27 inbound and 30 outbound) during the morning (AM) peak hour and 95 net new vehicle trips (59 inbound and 36 outbound)

[1] *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, LADOT, July 2020.
[2] Institute of Transportation Engineers *Trip Generation Manual,* 10th Edition, Washington, D.C., 2017.

during the afternoon (PM) peak hour. When compared to the Project evaluated in the 2020 Addendum Traffic Analysis, the revised Project will generate 11 fewer AM peak hour trips. When compared to the Project evaluated in the 2020 Addendum Traffic Analysis, there is no change in the number of PM peak hour trips generated by the revised Project.

VMT Analysis (Threshold T-2.1)

The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the CEQA Guidelines in November 2017 and an accompanying technical advisory guidance in April 2018 (*OPR Technical Advisory*) that amends the Appendix G question for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the CEQA Guidelines asking if the project will result in a substantial increase in vehicle miles traveled (VMT). Section 15064.3, subdivision (b)(1) states the following:

- Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

Comprehensive updates to the State CEQA Guidelines were certified and adopted by the California Natural Resources Agency in December 2018. Accordingly, the City adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G question:

- Threshold T-2.1: For a land use project, would the project conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)(1)?

For land use projects, the intent of this threshold is to assess whether a land use project causes substantial VMT impacts. The City has developed the following screening and impact criteria to address this question. The criteria below are based on the *OPR Technical Advisory* but reflects local considerations.

If the project requires discretionary action, and the answer is no to either T-2.1-1 or T-2.1-2, further analysis will not be required for CEQA Threshold T-2.1, and a "no impact" determination can be made for that threshold:

- T-2.1-1: Would the land use project generate a net increase of 250 or more daily vehicle trips?

For purposes of screening the daily vehicle trips, a proposed project's daily vehicle trips should be estimated using the City's VMT Calculator tool or the most recent edition of the ITE *Trip Generation Manual*. TDM strategies should not be considered for the purposes of screening. If existing land uses are present on the project site or there were previously terminated land uses that meet the criteria for trip credits described in the trip generation methodology discussion (refer to Subsection 3.3.4 of the TAG), the daily vehicle trips generated by the existing or qualified terminated land uses can be estimated using the VMT Calculator tool and subtracted from the proposed project's daily vehicle trips to determine the net increase in daily vehicle trips.

In addition to the above screening criteria, the portion of, or the entirety of a project that contains small-scale or local serving retail uses[3] are assumed to have less than significant VMT impacts. If the answer to the following question is no, then that portion of the project meets the screening criteria and a no impact determination can be made for the portion of the project that contains retail uses. However, if the retail project is part of a larger mixed-use project, then the remaining portion of the project may be subject to further analysis in accordance with the above screening criteria. Projects that include retail uses in excess of the screening criteria would need to evaluate the entirety of the project's VMT, as specified in Subsection 2.2.4 of the TAG.

- If the project includes retail uses, does the portion of the project that contain retail uses exceed a net 50,000 square feet?

Impact Criteria and Methodology

Per Section 2.2.3 of the TAG, a development project will have a potential VMT impact if the project meets the following:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located.

- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located.

[3] As noted in the TAG, the definition of "retail" for this purpose includes restaurant uses.

- For regional serving retail projects, the project would result in a net increase in VMT.

- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above.

Different VMT significance thresholds have been established for each APC boundary area as the characteristics of each are distinct in terms of land use, density, transit availability, employment, etc. As the Project Site is located within the Central Area Planning Commission (APC), the VMT impact criteria (i.e., 15% below the APC average) applicable to the Project is 6.0 Daily Household VMT per Capita and 7.6 Daily Work VMT per Employee.

The impact methodology set forth in the TAG for a mixed-use project such as the Project is as follows:

- Mixed-Use Projects. The project VMT impact should be considered significant if any one (or all) of the project land uses exceed the impact criteria for that particular land use, taking credit for internal capture. In such cases, mitigation options that reduce the VMT generated by any or all of the land uses could be considered.

Summary of Project VMT Analysis

The daily vehicle trips and VMT expected to be generated by the Project were forecast using Version 1.3 of the City's VMT Calculator tool. Copies of the detailed City of Los Angeles VMT Calculator worksheets for the proposed project are contained in ***Appendix A***. As indicated in the summary VMT Calculator worksheets, the Project is forecast to generate the following:

- The Project is estimated to generate a total of 1,077 daily vehicle trips. As a Project Design Feature, and as required per the City's existing TDM Ordinance, referred to in the Los Angeles Municipal Code (LAMC) Section 12.26.J), the Project will utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure.

- The estimated Daily Household VMT per Capita for the Project is 4.2 Household VMT per Capita and the estimated Daily Work VMT per Employee for the Project is 7.4 Daily Work VMT per Employee, which is less than the Central APC significance threshold of 6.0 Daily Household VMT per Capita and 7.6 Daily Work VMT per Employee.

Thus, based on the above analyses, the Project is not expected to result in a significant VMT impact. Therefore, no mitigation is necessary as it relates to VMT.

Summary of Cumulative VMT Analysis

As stated in the City's TAG document, analyses should consider both short-term and long-term project effects on VMT. Short-term effects are evaluated in the detailed Project-level VMT analysis summarized above. Long-term, or cumulative, effects are determined through a consistency check with the Southern California Association of Government's (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets. As such, projects that are consistent with this plan in terms of development, location, density, and intensity, are part of the regional solution for meeting air pollution and GHG goals. Projects that are deemed to be consistent would have a less than significant cumulative impact on VMT. Development in a location where the RTP/SCS does not specify any development may indicate a significant impact on transportation. However, as noted in the City's TAG document, for projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e., VMT per capita or VMT per employee) in the analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Projects that fall under the City's efficiency-based impact thresholds are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS.

Based on the above Project-related VMT analysis and the conclusions reported in above (i.e., which conclude that the Project falls under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), no cumulative VMT impacts are anticipated. Therefore, a "less than significant" determination can be made as it relates to the Project's cumulative VMT impact.

Conclusions

- *Project Description* – The 2020 Addendum Traffic Analysis evaluated a development description for the Project consisting of 132 hotel guestrooms (plus ancillary dining facilities), 48 residential apartment dwelling units, and 3,548 square feet of rooftop restaurant/outdoor terrace space. The hotel and rooftop restaurant components of the Project have been modified. The Project as proposed will provide 100 hotel guestrooms (plus 3,109 square feet of ancillary ground-floor dining facilities) and 6,476 square feet of rooftop restaurant space. No changes to the residential component of the Project are proposed.

- *Project Trip Generation* – The revised Project is expected to generate 57 net new vehicle trips (27 inbound trips and 30 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project is expected to generate 95 net new vehicle trips (59 inbound trips and 36 outbound trips). When compared to the Project evaluated in the 2020 Addendum Traffic Analysis, the updated Project will generate 11 fewer vehicle trips during the weekday AM peak hour. When compared to the Project evaluated in the 2020 Addendum Traffic Analysis, there is no change in the number of PM peak hour trips generated by the revised Project.

- *Traffic Analysis (2016 Guidelines)* – As the revised Project will generate fewer trips as compared to the developments evaluated in the 2018 Original Traffic Study and the 2020 Addendum Traffic Analysis, the relative traffic effects of the current Project would be even less as compared to the analysis of the Project provided in the 2018 Original Traffic Study under the 2016 Guidelines.

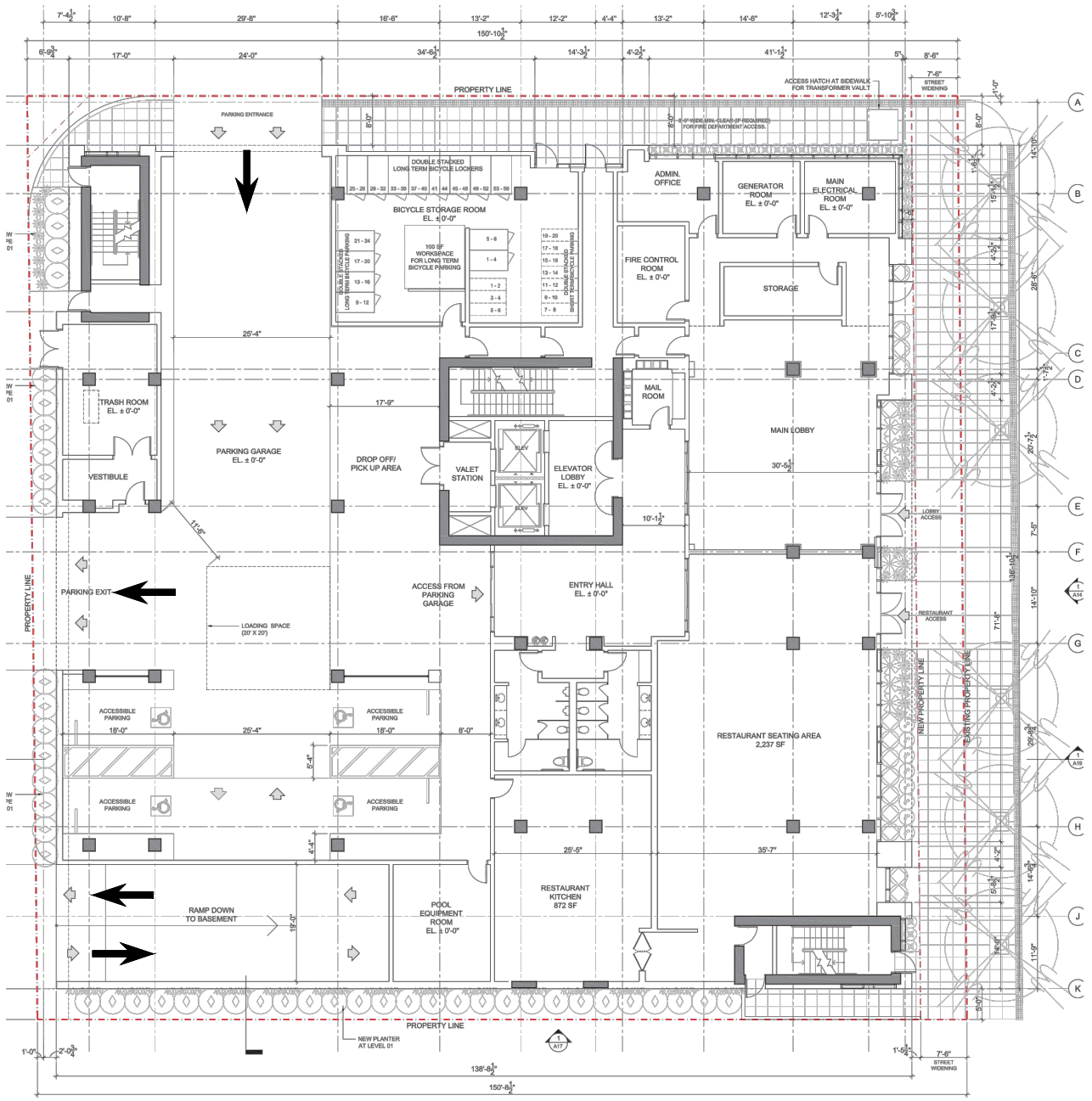
- *VMT Analysis* – The estimated Daily Household VMT per Capita for the Project is 4.2 Household VMT per Capita and the estimated Daily Work VMT per Employee for the Project is 7.4 Daily Work VMT per Employee, which is less than the Central APC significance threshold of 6.0 Daily Household VMT per Capita and 7.6 Daily Work VMT per Employee. As a Project Design Feature, and as required by the City's TDM Ordinance, the Project will utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Based on this analysis, the Project is not expected to result in a significant VMT impact. Further, based on the Project-related VMT analysis and the conclusions reported herein (i.e., which conclude that the Project falls under the City's efficiency-based impact thresholds and thus are already shown to align with the long-term VMT and GHG reduction goals of SCAG's RTP/SCS), no cumulative VMT impacts are anticipated.

cc: File

CAMERON LANE

LEBANON STREET

FLOWER STREET



NOT TO SCALE

SOURCE: NKLOSURES INC. ARCHITECTS

FIGURE 1
PROJECT SITE PLAN
GROUND FLOOR

LINSCOTT, LAW & GREENSPAN, engineers

1323 S. FLOWER STREET MIXED-USE PROJECT

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Table 1
PROJECT TRIP GENERATION [1]

13-May-21

LAND USE	SIZE	AM PEAK HOUR VOLUMES [2] IN	AM OUT	AM TOTAL	PM PEAK HOUR VOLUMES [2] IN	PM OUT	PM TOTAL
Proposed Project							
Hotel [3]	100 Rooms	28	19	47	29	25	54
Apartments [4]	48 DU	5	17	22	17	10	27
Rooftop Restaurant [5]	6,476 GSF	4	1	5	34	17	51
Subtotal		37	37	74	80	52	132
Transit Trips [6]							
Hotel (15%)		(4)	(3)	(7)	(4)	(4)	(8)
Apartments (15%)		(1)	(3)	(4)	(3)	(2)	(5)
Rooftop Restaurant (15%)		(1)	0	(1)	(5)	(3)	(8)
Subtotal		(6)	(6)	(12)	(12)	(9)	(21)
Internal Capture [7]							
Rooftop Restaurant (15%)		0	0	0	(4)	(2)	(6)
Subtotal		0	0	0	(4)	(2)	(6)
Subtotal Project Driveway Trips		**31**	**31**	**62**	**64**	**41**	**105**
Existing Site							
Warehouse [8]	(38,000) GSF	(5)	(1)	(6)	(2)	(5)	(7)
Subtotal		(5)	(1)	(6)	(2)	(5)	(7)
Transit Trips [6]							
Warehouse (15%)		1	0	1	0	1	1
Subtotal		1	0	1	0	1	1
Subtotal Existing Driveway Trips		**(4)**	**(1)**	**(5)**	**(2)**	**(4)**	**(6)**
NET INCREASE DRIVEWAY TRIPS		**27**	**30**	**57**	**62**	**37**	**99**
Proposed Pass-By Trips [9]							
Rooftop Restaurant (10%)		0	0	0	(3)	(1)	(4)
Subtotal		0	0	0	(3)	(1)	(4)
NET INCREASE "OFF-SITE" TRIPS		**27**	**30**	**57**	**59**	**36**	**95**
NET INCREASE "OFF-SITE" TRIPS FROM 2020 ADDENDUM TRAFFIC ANALYSIS		**33**	**35**	**68**	**57**	**38**	**95**
NET DIFFERENCE		**(6)**	**(5)**	**(11)**	**2**	**(2)**	**0**

[1] Source: ITE *Trip Generation Manual* , 10th Edition, 2017.
[2] Trips are one-way traffic movements, entering or leaving.
[3] ITE Land Use Code 310 (Hotel) trip generation average rates.
- AM Peak Hour Trip Rate: 0.47 trips/room; 59% inbound/41% outbound
- PM Peak Hour Trip Rate: 0.54 trips/room; 54% inbound/46% outbound
[4] ITE Land Use Code 220 (Multifamily Housing [Low-Rise]) trip generation average rates.
- AM Peak Hour Trip Rate: 0.46 trips/dwelling unit; 23% inbound/77% outbound
- PM Peak Hour Trip Rate: 0.56 trips/dwelling unit; 63% inbound/37% outbound
[5] ITE Land Use Code 931 (Quality Restaurant) trip generation average rates.
- AM Peak Hour Trip Rate: 0.73 trips/1,000 SF of floor area; Assumed 80% inbound/20% outbound
- PM Peak Hour Trip Rate: 7.80 trips/1,000 SF of floor area; 67% inbound/33% outbound
[6] The Project Site is located within 1/4 mile of a Metro Blue Line rail station/Metro Silver Line Rapid bus stop. The trip reduction for transit trips has been applied to the hotel, residential, and commercial components of the Project based on the *LADOT Transportation Assessment Guidelines,* July 2020 for developments within a quarter-mile walking distance of a transit station or a RapidBus stop.
[7] The internal capture reduction for the commercial use is based on the synergy between the hotel, residential, and commercial uses provided within the Project Site.
[8] ITE Land Use Code 150 (Warehousing) trip generation average rates.
- AM Peak Hour Trip Rate: 0.17 trips/1,000 SF of floor area; 77% inbound/23% outbound
- PM Peak Hour Trip Rate: 0.19 trips/1,000 SF of floor area; 27% inbound/73% outbound
[9] Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. The trip reduction for pass-by trips has been applied to the commercial component of the Project based on the *LADOT Transportation Assessment Guidelines,* July 2020 for Quality Restaurant.

APPENDIX A

LADOT VMT CALCULATOR OUTPUT

CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

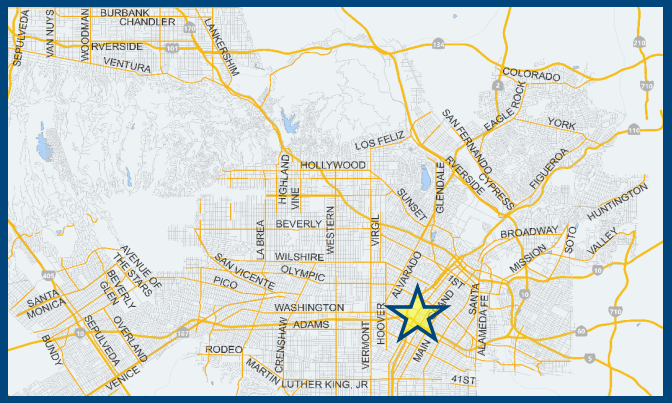
Project Screening Criteria: Is this project required to conduct a vehicle miles traveled analysis?

Project Information

Project: 1323 S. Flower Street Mixed-Use

Scenario: Proposed Project

Address: 1323 S FLOWER ST, 90015



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

○ Yes ○ No

Existing Land Use

Land Use Type	Value	Unit
Industrial | Warehousing/Self-Storage	38	ksf
Industrial | Warehousing/Self-Storage	38	ksf

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

Proposed Project Land Use

Land Use Type	Value	Unit
Retail | Quality Restaurant	6.476	ksf
Housing | Multi-Family	48	DU
Housing | Hotel	100	Rooms
Retail | Quality Restaurant	6.476	ksf

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

Project Screening Summary

Existing Land Use	Proposed Project
69 Daily Vehicle Trips	1,121 Daily Vehicle Trips
486 Daily VMT	7,403 Daily VMT

Tier 1 Screening Criteria

Project will have less residential units compared to existing residential units & is within one-half mile of a fixed-rail station. ☐

Tier 2 Screening Criteria

The net increase in daily trips < 250 trips	1,052 Net Daily Trips
The net increase in daily VMT ≤ 0	6,917 Net Daily VMT
The proposed project consists of only retail land uses ≤ 50,000 square feet total.	6.476 ksf

The proposed project is required to perform VMT analysis.

Measuring the Miles

5/13/2021

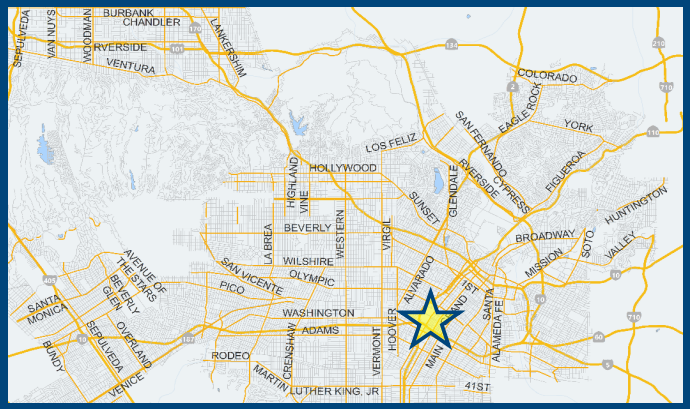
CITY OF LOS ANGELES VMT CALCULATOR Version 1.3

Project Information

Project: 1323 S. Flower Street Mixed-Use

Scenario: Proposed Project

Address: 1323 S FLOWER ST, 90015



Proposed Project Land Use Type	Value	Unit
Housing | Multi-Family	48	DU
Housing | Hotel	100	Rooms
Retail | Quality Restaurant	6.476	ksf

TDM Strategies

Select each section to show individual strategies

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

	Proposed Project	With Mitigation
Max Home Based TDM Achieved?	**No**	**No**
Max Work Based TDM Achieved?	**No**	**No**

A Parking

Reduce Parking Supply

91 city code parking provision for the project site

89 actual parking provision for the project site

☐ Proposed Prj ☐ Mitigation

Unbundle Parking

175 monthly parking cost (dollar) for the project site

☐ Proposed Prj ☐ Mitigation

Parking Cash-Out

50 percent of employees eligible

☐ Proposed Prj ☐ Mitigation

Price Workplace Parking

6.00 daily parking charge (dollar)

50 percent of employees subject to priced parking

☐ Proposed Prj ☐ Mitigation

Residential Area Parking Permits

200 cost (dollar) of annual permit

☐ Proposed Prj ☐ Mitigation

B Transit

C Education & Encouragement

D Commute Trip Reductions

E Shared Mobility

F Bicycle Infrastructure

G Neighborhood Enhancement

Analysis Results

Proposed Project	With Mitigation
1,077 Daily Vehicle Trips	**1,077** Daily Vehicle Trips
7,108 Daily VMT	**7,108** Daily VMT
4.1 Household VMT per Capita	**4.1** Household VMT per Capita
7.4 Work VMT per Employee	**7.4** Work VMT per Employee

Significant VMT Impact?

Proposed Project	With Mitigation
Household: No Threshold = 6.0 15% Below APC	**Household: No** Threshold = 6.0 15% Below APC
Work: No Threshold = 7.6 15% Below APC	**Work: No** Threshold = 7.6 15% Below APC

Measuring the Miles

5/13/2021

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: May 13, 2021
Project Name: 1323 S. Flower Street Mixed-Use
Project Scenario: Proposed Project
Project Address: 1323 S FLOWER ST, 90015

Version 1.3

Project Information			
Land Use Type		**Value**	**Units**
Housing	*Single Family*	*0*	*DU*
	Multi Family	48	DU
	Townhouse	*0*	*DU*
	Hotel	100	Rooms
	Motel	*0*	*Rooms*
Affordable Housing	*Family*	*0*	*DU*
	Senior	*0*	*DU*
	Special Needs	*0*	*DU*
	Permanent Supportive	*0*	*DU*
Retail	*General Retail*	*0.000*	*ksf*
	Furniture Store	*0.000*	*ksf*
	Pharmacy/Drugstore	*0.000*	*ksf*
	Supermarket	*0.000*	*ksf*
	Bank	*0.000*	*ksf*
	Health Club	*0.000*	*ksf*
	High-Turnover Sit-Down Restaurant	*0.000*	*ksf*
	Fast-Food Restaurant	*0.000*	*ksf*
	Quality Restaurant	6.476	ksf
	Auto Repair	*0.000*	*ksf*
	Home Improvement	*0.000*	*ksf*
	Free-Standing Discount	*0.000*	*ksf*
	Movie Theater	*0*	*Seats*
Office	*General Office*	*0.000*	*ksf*
	Medical Office	*0.000*	*ksf*
Industrial	*Light Industrial*	*0.000*	*ksf*
	Manufacturing	*0.000*	*ksf*
	Warehousing/Self-Storage	*0.000*	*ksf*
School	*University*	*0*	*Students*
	High School	*0*	*Students*
	Middle School	*0*	*Students*
	Elementary	*0*	*Students*
	Private School (K-12)	*0*	*Students*
Other		*0*	*Trips*

CITY OF LOS ANGELES VMT CALCULATOR

Report 1: Project & Analysis Overview

Date: May 13, 2021
Project Name: 1323 S. Flower Street Mixed-Use
Project Scenario: Proposed Project
Project Address: 1323 S FLOWER ST, 90015

Version 1.3

Analysis Results			
Total Employees: 76 Total Population: 108			
Proposed Project		***With Mitigation***	
1,077	**Daily Vehicle Trips**	**1,077**	**Daily Vehicle Trips**
7,108	**Daily VMT**	**7,108**	**Daily VMT**
4.1	**Household VMT per Capita**	**4.1**	**Household VMT per Capita**
7.4	**Work VMT per Employee**	**7.4**	**Work VMT per Employee**

Significant VMT Impact?			
APC: Central			
Impact Threshold: 15% Below APC Average Household = 6.0 Work = 7.6			
Proposed Project		***With Mitigation***	
VMT Threshold	**Impact**	**VMT Threshold**	**Impact**
Household > 6.0	No	Household > 6.0	No
Work > 7.6	No	Work > 7.6	No

TDM Strategy Inputs

Strategy Type		Description	Proposed Project	Mitigations
Parking	*Reduce parking supply*	*City code parking provision (spaces)*	*0*	*0*
		Actual parking provision (spaces)	*0*	*0*
	Unbundle parking	*Monthly cost for parking ($)*	*$0*	*$0*
	Parking cash-out	*Employees eligible (%)*	*0%*	*0%*
	Price workplace parking	*Daily parking charge ($)*	*$0.00*	*$0.00*
		Employees subject to priced parking (%)	*0%*	*0%*
	Residential area parking permits	*Cost of annual permit ($)*	*$0*	*$0*

(cont. on following page)

TDM Strategy Inputs, Cont.

Strategy Type		Description	Proposed Project	Mitigations
Transit	*Reduce transit headways*	*Reduction in headways (increase in frequency) (%)*	*0%*	*0%*
		Existing transit mode share (as a percent of total daily trips) (%)	*0%*	*0%*
		Lines within project site improved (<50%, >=50%)	*0*	*0*
	Implement neighborhood shuttle	*Degree of implementation (low, medium, high)*	*0*	*0*
		Employees and residents eligible (%)	*0%*	*0%*
	Transit subsidies	*Employees and residents eligible (%)*	*0%*	*0%*
		Amount of transit subsidy per passenger (daily equivalent) ($)	*$0.00*	*$0.00*
Education & Encouragement	*Voluntary travel behavior change program*	*Employees and residents participating (%)*	*0%*	*0%*
	Promotions and marketing	Employees and residents participating (%)	100%	100%

(cont. on following page)

TDM Strategy Inputs, Cont.

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

(cont. on following page)

TDM Strategy Inputs, Cont.

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 3: TDM Outputs

Date: May 13, 2021
Project Name: 1323 S. Flower Street Mixed-Use
Project Scenario: Proposed Project
Project Address: 1323 S FLOWER ST, 90015

Version 1.3

TDM Adjustments by Trip Purpose & Strategy

Place type: Compact Infill

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Parking	Reduce parking supply	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	TDM Strategy Appendix, Parking sections 1 - 5
	Unbundle parking	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Parking cash-out	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Price workplace parking	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Residential area parking permits	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	
Transit	Reduce transit headways	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	TDM Strategy Appendix, Transit sections 1 - 3
	Implement neighborhood shuttle	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Transit subsidies	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
Education & Encouragement	Voluntary travel behavior change program	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	TDM Strategy Appendix, Education & Encouragement sections 1 - 2
	Promotions and marketing	4%	4%	4%	4%	4%	4%	4%	4%	4%	4%	4%	*0%*	
Commute Trip Reductions	Required commute trip reduction program	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	TDM Strategy Appendix, Commute Trip Reductions sections 1 - 4
	Alternative Work Schedules and Telecommute Program	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Employer sponsored vanpool or shuttle	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
	Ride-share program	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	*0%*	
Shared Mobility	Car-share	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Shared Mobility sections 1 - 3
	Bike share	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	*0.00%*	
	School carpool program	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	

TDM Adjustments by Trip Purpose & Strategy, Cont.

Place type: Compact Infill

		Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*		*Source*
		Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	
Bicycle Infrastructure	Implement/ Improve on-street bicycle facility	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Bicycle Infrastructure sections 1 - 3
	Include Bike parking per LAMC	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
	Include secure bike parking and showers	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	
Neighborhood Enhancement	Traffic calming improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	TDM Strategy Appendix, Neighborhood Enhancement sections 1 - 2
	Pedestrian network improvements	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	*0.0%*	

Final Combined & Maximum TDM Effect

	Home Based Work Production		*Home Based Work Attraction*		*Home Based Other Production*		*Home Based Other Attraction*		*Non-Home Based Other Production*		*Non-Home Based Other Attraction*	
	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated	Proposed	Mitigated
COMBINED TOTAL	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*0%*
MAX. TDM EFFECT	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*	*4%*

= Minimum (X%, 1-[(1-A)*(1-B)…])

where X%=

PLACE TYPE MAX:	*urban*	*75%*
	compact infill	*40%*
	suburban center	*20%*
	suburban	*15%*

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

CITY OF LOS ANGELES VMT CALCULATOR

Report 4: MXD Methodology

Date: May 13, 2021
Project Name: 1323 S. Flower Street Mixed-Use
Project Scenario: Proposed Project
Project Address: 1323 S FLOWER ST, 90015

Version 1.3

MXD Methodology - Project Without TDM

	Unadjusted Trips	MXD Adjustment	MXD Trips	Average Trip Length	Unadjusted VMT	MXD VMT
Home Based Work Production	43	-30.2%	30	6.7	288	201
Home Based Other Production	119	-51.3%	58	4.5	536	261
Non-Home Based Other Production	257	-8.9%	234	7.8	2,005	1,825
Home-Based Work Attraction	110	-33.6%	73	8.0	880	584
Home-Based Other Attraction	944	-43.9%	530	6.0	5,664	3,180
Non-Home Based Other Attraction	215	-8.8%	196	6.9	1,484	1,352

MXD Methodology with TDM Measures

	Proposed Project			*Project with Mitigation Measures*		
	TDM Adjustment	Project Trips	Project VMT	TDM Adjustment	Mitigated Trips	Mitigated VMT
Home Based Work Production	-4.0%	29	193	-4.0%	29	193
Home Based Other Production	-4.0%	56	251	-4.0%	56	251
Non-Home Based Other Production	-4.0%	225	1,752	-4.0%	225	1,752
Home-Based Work Attraction	-4.0%	70	561	-4.0%	70	561
Home-Based Other Attraction	-4.0%	509	3,053	-4.0%	509	3,053
Non-Home Based Other Attraction	-4.0%	188	1,298	-4.0%	188	1,298

MXD VMT Methodology Per Capita & Per Employee

Total Population: 108
Total Employees: 76
APC: Central

	Proposed Project	*Project with Mitigation Measures*
Total Home Based Production VMT	**444**	**444**
Total Home Based Work Attraction VMT	**561**	**561**
Total Home Based VMT Per Capita	**4.1**	**4.1**
Total Work Based VMT Per Employee	**7.4**	**7.4**

VMT Calculator User Agreement

The Los Angeles Department of Transportation (LADOT), in partnership with the Department of City Planning and Fehr & Peers, has developed the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator to estimate project-specific daily household VMT per capita and daily work VMT per employee for land use development projects. This application, the VMT Calculator, has been provided to You, the User, to assess vehicle miles traveled (VMT) outcomes of land use projects within the City of Los Angeles. The term "City" as used below shall refer to the City of Los Angeles. The terms "City" and "Fehr & Peers" as used below shall include their respective affiliates, subconsultants, employees, and representatives.

The City is pleased to be able to provide this information to the public. The City believes that the public is most effectively served when they are provided access to the technical tools that inform the public review process of private and public land use investments. However, in using the VMT Calculator, You agree to be bound by this VMT Calculator User Agreement (this Agreement).

VMT Calculator Application for the City of Los Angeles. The City's consultant calibrated the VMT Calculator's parameters in 2018 to estimate travel patterns of locations in the City, and validated those outcomes against empirical data. However, this calibration process is limited to locations within the City, and practitioners applying the VMT Calculator outside of the City boundaries should not apply these estimates without further calibration and validation of travel patterns to verify the VMT Calculator's accuracy in estimating VMT in such other locations.

Limited License to Use. This Agreement gives You a limited, non-transferrable, non-assignable, and non-exclusive license to use and execute a copy of the VMT Calculator on a computer system owned, leased or otherwise controlled by You in Your own facilities, as set out below, provided You do not use the VMT Calculator in an unauthorized manner, and that You do not republish, copy, distribute, reverse-engineer, modify, decompile, disassemble, transfer, or sell any part of the VMT Calculator, and provided that You know and follow the terms of this Agreement. Your failure to follow the terms of this Agreement shall automatically terminate this license and Your right to use the VMT Calculator.

Ownership. You understand and acknowledge that the City owns the VMT Calculator, and shall continue to own it through Your use of it, and that no transfer of ownership of any kind is intended in allowing You to use the VMT Calculator.

Warranty Disclaimer. In spite of the efforts of the City and Fehr & Peers, some information on the VMT Calculator may not be accurate. The VMT Calculator, OUTPUTS AND ASSOCIATED DATA ARE PROVIDED "as is" WITHOUT WARRANTY OF ANY KIND, whether expressed, implied, statutory, or otherwise including but not limited to, the implied warranties of merchantability and fitness for a particular purpose.

Limitation of Liability. It is understood that the VMT Calculator is provided without charge. Neither the City nor Fehr & Peers can be responsible or liable for any information derived from its use, or for any delays, inaccuracies, incompleteness, errors or omissions arising out of your use of the VMT Calculator or with respect to the material contained in the VMT Calculator. You understand and agree that Your sole remedy against the City or Fehr & Peers for loss or damage caused by any defect or failure of the

VMT Calculator, regardless of the form of action, whether in contract, tort, including negligence, strict liability or otherwise, shall be the repair or replacement of the VMT Calculator to the extent feasible as determined solely by the City. In no event shall the City or Fehr & Peers be responsible to You or anyone else for, or have liability for any special, indirect, incidental or consequential damages (including, without limitation, damages for loss of business profits or changes to businesses costs) or lost data or downtime, however caused, and on any theory of liability from the use of, or the inability to use, the VMT Calculator, whether the data, and/or formulas contained in the VMT Calculator are provided by the City or Fehr & Peers, or another third party, even if the City or Fehr & Peers have been advised of the possibility of such damages.

This Agreement and License shall be governed by the laws of the State of California without regard to their conflicts of law provisions, and shall be effective as of the date set forth below and, unless terminated in accordance with the above or extended by written amendment to this Agreement, shall terminate on the earlier of the date that You are not making use of the VMT Calculator or one year after the beginning of Your use of the VMT Calculator.

By using the VMT Calculator, You hereby waive and release all claims, responsibilities, liabilities, actions, damages, costs, and losses, known and unknown, against the City and Fehr & Peers for Your use of the VMT Calculator.

Before making decisions using the information provided in this application, contact City LADOT staff to confirm the validity of the data provided.

Print and sign below, and submit to LADOT along with the transportation assessment Memorandum of Understanding (MOU).

You, the User	
By:	
Print Name:	Jason Shender
Title:	Transportation Planner III
Company:	Linscott, Law & Greenspan, Engineers
Address:	20931 Burbank Boulevard, Suite C Woodland Hills, CA 91367
Phone:	(818) 835-8648
Email Address:	jshender@llgengineers.com
Date:	5/13/2021

Noise Study
March 2023

1323 S. Flower Street Project
1323, 1327, 1331 S. Flower Street, Los Angeles, CA 90015

Prepared by:

CAJA Environmental Services, LLC

9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311

1 Introduction

This report evaluates noise impacts that could result from the construction and operations of the 1323 S. Flower Street Project (Project). Supporting documents – such as noise measurement technical reports, calculation worksheets, modeling outputs, and maps – are included in **Appendix A** to this report.

2 Project Description

The Project Site is located at 1323, 1327, 1331 S. Flower Street in the Central City Community Plan Area of the City of Los Angeles. The 0.52-acre Project Site is bounded by Cameron Lane to the north, Flower Street to the east, commercial uses to the south, and Lebanon Street to the west. The Site is currently developed with a 38,025 square-foot light manufacturing building.

The Project would remove all existing uses and construct an 11-story mixed-use development consisting of a hotel with 100 guestrooms, 48 apartment units, 3,109 square feet of ground floor restaurant space, and 6,476 square feet of rooftop restaurant space.

3 Environmental Setting

3.1 Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. **Table 1** provides examples of A-weighted noise levels from common sources. Although the terms “sound” and “noise” are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.[1] Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

Table 1
A-Weighted Decibel Scale

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40

1 California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels. Source: Cowan, James P., Handbook of Environmental Acoustics, 1993	

3.1.1 Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq})

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max})

L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{mix})

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq}.

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded *X*% of a specified time period. For example, L_{90} represents the noise level that is exceeded 90% of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.[2]

2 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

3.1.2 Effects of Environmental Noise

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

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.[3] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[4]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.[5]

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.[6] Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.[7] However, few people are highly annoyed by daytime noise levels below 55 dBA.[8]

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has determined that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100% intelligibility of speech sounds.[9] Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration (such as reading). The EPA has surmised that, given the preservation of an indoor noise level associated with 100% speech intelligibility, the average community reaction is not evident and "7 dBA below levels associated

3 National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.
4 World Health Organization, Guidelines for Community Noise, 1999.
5 World Health Organization, Guidelines for Community Noise, 1999.
6 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
7 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
8 World Health Organization, Guidelines for Community Noise, 1999.
9 EPA, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, 1974.

with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

3.1.3 Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distances from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at the rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources, such as highways, attenuates at the rate of 3 dBA for each doubling of distance.[10]

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as soft dirt or grass may contribute to increased attenuation rates of up to an additional 8-10 dBA per doubling of distance.[11]

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. Barriers can reduce source noise levels by up to 20 dBA, though it is generally infeasible for temporary barriers to reduce source noise levels by more than 15 dBA.[12] In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.[13]

3.2 Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.[14] Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

3.2.1 Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV):

Peak Particle Velocity (PPV)

10 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
11 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
12 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
13 Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.
14 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).[15]

3.2.2 Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Instead, most people consider environmental vibration to be an annoyance that may affect concentration or disturb sleep. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.[16] The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.[17]

3.3 Regulatory Framework

3.3.1 Federal

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

3.3.2 State

3.3.2.1 2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but recommendations intended to aid communities in determining their noise-acceptability standards.

3.3.3 City of Los Angeles

3.3.3.1 General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of

15 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.
16 Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.
17 Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.

significance for evaluating a project's noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown in **Table 2** below. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter…"[18] "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks."[19] The Noise Element further instructs that the table is designed "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Table 2
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

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.

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

N = 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.

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

Source: Noise Element of the Los Angeles City General Plan – Exhibit I

18 Noise Element of the Los Angeles City General Plan, February 1999.
19 Noise Element of the Los Angeles City General Plan, February 1999.

3.3.3.2 Los Angeles Municipal Code

The City of Los Angeles Municipal Code (the "LAMC") contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations.

Section 112.03 "Construction Noise" instructs that "Noise due to construction or repair work shall be regulated as provided by Section 41.40 of this Code." Section 41.40(a) would prohibit the Project's construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED*
>
> (a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.
>
> (c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

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

> *SEC.112.05 MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS*
>
> Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered

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

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

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

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

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

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

SEC.112.01 RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

3.3.4 Federal Transit Administration (FTA)

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table 3** shows the FTA's vibration guidelines for building and structural damage.

Table 3
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

3.4 Existing Conditions

3.4.1 Project Site

The Project Site is currently improved with a 38,025 square-foot light manufacturing building and related parking. Given the site's location in a dense urban environment and along a major arterial roadway, noise from the current land use does not contribute substantially to surrounding ambient noise levels, which are primarily transportation-related due to the proximity of Flower Street and the nearby Metro rail right of way.

3.4.2 Noise-Sensitive Receptors

The Project is located in a dense urban environment and is therefore surrounded by a variety of land uses. Land uses that are noise-sensitive in the vicinity of the Project include a multitude of residential land uses, as well as a hospital land use. The nearest residential land uses include, but are not limited to, the following:

- City Lights on Fig Apartments: This multi-family residential building is located at 1300 S. Figueroa Street, approximately 25 feet north of the Project.

- Oviatt Apartments: This multi-family residential building is located at 1315 S. Figueroa Street, approximately 20 feet north of the Project.

- Avant Apartments: This multi-family residential complex is located at 1340-1500 S. Figueroa Street, approximately 50 feet southwest of the Project.

Other residential receptors are located at greater distances from the Project and would experience lesser impacts. The nearby hospital land use is the following receptor:

- Dignity Health – California Hospital Medical Center: This hospital land use is located approximately 500 feet southeast of the Project at 1401 S. Grand Avenue. However, given this receptor's distance from the Project and the numerous rows of multi-story buildings between this receptor and the Project, there is no realistic potential for the Project to result in discernible, let alone substantial, noise increases at this receptor.

Given their distances to the Project, the following analysis focuses on the City Lights on Fig Apartments, Oviatt Apartments, and Avant Apartments receptors in order to assess the significance of the Project's potential noise impacts. Other noise-sensitive land uses are located farther from the Project than the given residential receptors and would experience lesser impacts as a result.

A map showing the location of the Project and the listed sensitive receptors is included in **Appendix A**.

3.4.3 Existing Ambient Noise Conditions

On September 1, 2021, noise measurements were obtained at locations near the Project Site to aid in the characterization of daytime ambient noise conditions surrounding the Project and its nearest sensitive receptors. At all locations, the primary source of noise levels was vehicular traffic. The measured noise levels are shown in **Table 4**, below.

Table 4
Existing Noise Levels

Noise Measurement Location	Sound Level (dBA L_{eq})
1. Flower Street, near Cameron Lane	72.1
2. Lebanon Street, near Project	62.3
Source: NTEC, 2021.	

4 Project Impacts

4.1 Methodology

The following section discusses the methods used to analyze the Project's noise impacts:

4.1.1 On-Site Construction Activities

The Project's construction noise impact associated with its on-site construction activities was determined by identifying the noise levels of construction equipment with the greatest potential to disrupt nearby sensitive receptors and assessing the noise increases that could result from their operations. Reference equipment noise levels were derived from the Federal Highway Administration's Roadway Construction Noise Model, version 2.0 (FHWA RCNM 2.0).

4.1.2 Off-Site Construction Activities

The Project's off-site construction noise impact from haul trucks was assessed by estimating the Project's number of haul trips and comparing this figure with surrounding traffic levels to determine significance.

4.1.3 On-Site Operational Noise Sources

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

4.1.4 Off-Site Operational Noise Sources

The Project's off-site operational noise impact from its related traffic generation was assessed by comparing the Project's estimated trip generation with surrounding traffic levels to determine significance.

4.1.5 Construction Vibration Sources

The Project's potential to generate damaging levels of groundborne vibration was analyzed by identifying construction vibration sources and estimating the maximum vibration levels that they could produce at nearby buildings, all based on the principles and guidelines recommended by the FTA in its 2018 Transit Noise and Vibration Impact Assessment manual. Vibration levels were then compared with the manual's suggested damage criteria for various building categories (**Table 3**).

4.1.6 Operational Vibration Sources

Significant sources of operational vibration are generally limited to heavy equipment or industrial operations. The Project proposes to construct a mixed-use hotel building, and no such operations would take place.

4.2 Thresholds of Significance

The following thresholds are adopted to aid in the determination of the Project's noise impacts:

4.2.1 State CEQA Guidelines: Appendix G

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to noise if the Project would result in:

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

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

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

4.2.2 On-Site Construction Noise Threshold

Based on guidelines from the City of Los Angeles Department of Planning, the Project's construction noise impact would normally be considered significant if the following would occur:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA L_{eq} or more at a noise-sensitive land use;

- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA L_{eq} or more at a noise-sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

The averaging period shall be equivalent to the duration of a single work day, from start to finish of that day's construction activities.

4.2.3 Operational Noise Thresholds

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

- Project operations would cause ambient noise levels at off-site locations to increase by 3 dBA CNEL or more to or within "normally unacceptable" or "clearly unacceptable" noise and land use compatibility categories, as defined by the City's General Plan Noise Element (see **Table 2**).

- Project operations would cause any 5 dBA or greater noise increase.[20]

4.2.4 Groundborne Vibration Threshold

As discussed earlier, there are no federal, state, county, or City standards that would regulate the Project's vibration impacts from temporary construction activities, nor are there quantitative thresholds. As a result, based on guidance from the City of Los Angeles Department of Planning, the criteria identified by the FTA in its 2018 Transit Noise and Vibration Impact Assessment

20 As a 3 dBA increase represents a barely noticeable change in noise level, this threshold considers any increase in ambient noise levels to or within a land use's "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories to be significant so long as the noise level increase can be considered barely perceptible. For instances when the noise level increase would not necessarily result in "normally unacceptable" or "clearly unacceptable" noise/land use compatibility, a readily noticeable 5 dBA increase would still be considered significant. Increases less than 3 dBA are unlikely to result in noticeably louder ambient noise conditions and would therefore be considered less than significant.

manual (see **Table 3**) are used where applicable and relevant to assist in analyzing the Project's groundborne vibration impacts as they pertain to Appendix G checklist question (b).

5 Analysis of Project Impacts

5.1 Threshold a):

Would the project result in 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?

5.1.1 On-Site Construction Activities

The proposed construction would generate noise during the estimated 31 months of demolition, excavation, building construction, and other construction activities. During all construction phases, noise-generating activities would be permitted to occur at the Project Site between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M, but the Project is anticipated to utilize a five-day work week and an eight-hour workday.

Noise from demolition and excavation activities is typically the foremost concern when evaluating a project's potential construction noise impact, as these activities often require extensive use of heavy-duty, diesel-powered earthmoving equipment. Therefore, the following analysis assesses noise impacts that may result from the Project's demolition and excavation phases.

Demolition would involve the removal of the site's existing improvements, which include structures and paved areas. The bulk of demolition activity would be characterized by an excavator demolishing site features and depositing debris into dumpsters for removal. During excavation, an excavator would excavate cut soils for the Project's foundation and subterranean levels. As excavators (or other vehicles) operate across the approximately 0.52-acre Project Site, construction noise levels at sensitive receptors would fluctuate depending on distances from equipment to these receptors. Noise levels would be greater when vehicles are in proximity of sensitive receptors and lower when farther away. The noise impact associated with the Project's demolition and grading activities has been evaluated by modeling the noise levels that would be associated with an excavator operating across a half-acre parcel of land that is equivalent to the Project's site acreage, then estimating noise levels at sensitive receptors based on their distances from the Project Site.

The noise modeling also accounts for LAMC Section 112.05, which would limit noise levels from the Project's construction equipment to 75 dBA or below, as the Project Site is located within 500 feet of residential-zoned neighborhoods. Compliance would be achieved by erecting noise

barriers around the location of the Project's construction activities, which is a standard industry "best practice" for construction in urban or otherwise noise-sensitive areas, as well as a frequent technique for complying with the LAMC Section 112.05 regulation. Noise barriers would shield the lower levels of nearby residential land uses from construction noise levels in excess of the 75 dBA limit. At upper levels, it is assumed that limited or no shielding would be provided. However, given their additional height and therefore distance from the Project's demolition and excavation activities, upper levels would not be expected to experience construction noise levels in excess of 75 dBA.

Table 5 shows the estimated noise impacts that would result from excavator operations during the Project's demolition and excavation phases. Noise impacts have been estimated for the lower and upper levels of nearby sensitive receptors because, as explained, exposure to the Project's noise levels would differ based on the height of the receiving location. As shown, noise increases would be below the 5 dBA L_{eq} threshold of significance for daytime construction activities lasting more than 10 days in a three-month period at all receptors. Other construction activities would generate reduced noise levels or would generate noise on a more intermittent basis and result in lesser noise increases at sensitive receptors when measured over the course of a single workday, as per the threshold of significance. Therefore, the Project's noise impact from on-site construction activities would be **less than significant**.

Table 5
Construction Noise Levels – Demolition and Excavation

Receptor	Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Noise Level (dBA L_{eq})	Increase
City Lights on Fig Apartments – Lower Level	62.3	62.3	65.3	3.0
City Lights on Fig Apartments – Upper Level	65.0	62.3	66.9	4.6
Oviatt Apartments – Lower Level	63.6	72.1	72.7	0.6
Oviatt Apartments – Upper Level	65.8	72.1	73.0	0.9
Avant Apartments – Lower Level	57.8	62.3	63.6	1.3
Avant Apartments – Upper Level	62.1	62.3	65.2	2.9
Source: NTEC, 2023.				

5.1.2 Off-Site Construction Activities

Section 112.05 of the LAMC does not regulate off-site noise emissions from road legal trucks such as delivery vehicles, concrete mixing trucks, pumping trucks, haul trucks, and worker vehicles. However, the operations of these vehicles would still comply with the construction restrictions set forth by Section 41.40 of the LAMC.

Trucks and other construction-related vehicles would access the Project Site over the course of all construction phases. During the Project's grading phase, approximately 3,100 one-way haul trips would be required to export cut soils from the Project Site over the course of 107 work days, resulting in an average of approximately 29 one-way haul trips per day. Even if a conservative maximum 50 haul trips per day is assumed, this addition of haul trips to surrounding downtown

roadways with thousands of daily vehicle trips would have a nominal effect on roadside ambient noise levels. Therefore, the Project's noise impact from off-site construction sources would be **less than significant**.

5.1.3 On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below:

Mechanical Equipment

Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noise from mechanical sources such as heating, air conditioning, and ventilation systems do not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this regulation, distances to sensitive receptors, surrounding ambient noise levels, and the relatively quiet operation of modern HVAC systems, it is unlikely that the Project's HVAC systems would be capable of increasing off-site noise levels by a discernable degree. Furthermore, many surrounding land uses (both commercial and residential) contain rooftop-mounted HVAC equipment. Given these considerations, the Project's HVAC systems are not anticipated to have a substantial effect on surrounding ambient noise conditions, nor would they introduce a new major source of noise to the location of the Project.

Pool filtering and pumping equipment would also be regulated by LAMC Section 112.02. However, this equipment would be enclosed within the Project's building envelope and would not be audible at off-site locations.

Auto-Related Activities

A total of 85 parking spaces would be located in ground-floor and basement parking areas. All parking areas would be fully enclosed within the Project's building envelope. Most parking would consist of stacked spaces, which would be facilitated by automated mechanical lift systems. Intermittent noises from automated parking devices are unlikely to be audible at nearby receptors given their locations within the fully enclosed basement areas. Other intermittent noises, such as doors slamming or engines starting, are also unlikely to be audible at nearby receptors. Further, all drop off/pick up areas would be located within the ground floor garage. Overall, the Project's internal parking areas are unlikely to result in measurable noise increases at off-site locations. Any intermittently audible noise events would have a nominal effect on surrounding ambient noise levels, which are elevated due to the highly urbanized nature of the Project's location.

Rooftop Uses

The Project would contain a roof deck level that includes an outdoor restaurant and terrace area. The roof deck would contain no facilities for amplified entertainment (e.g. music acts, DJs, etc.). The primary source of noise associated with the Project's roof deck would be speech/conversation from outdoor restaurant and terrace users. A number of factors demonstrate that noise from these users would be minimal at surrounding residential land uses:

- Vocal noise from speech/conversation averages between 55 and 67 dBA at a reference distance of one meter, in proportion to background noise levels.[21]
- Outdoor restaurant and terrace areas are oriented towards Flower Street, where ambient noise levels exceed 70 dBA L_{eq}.
- The Project's roof deck would be over 50 feet higher than the elevation of the nearest residential buildings (City Lights on Fig Apartments and Oviatt Apartments).
- Outdoor roof deck areas would feature a solid parapet exceeding the height of seated restaurant patrons, which would shield and attenuate noise levels from these patrons.

Even if conservatively assuming that the aforementioned rooftop uses would generate a noise level of 75 dBA at 10 feet, associated noise levels would be well below 55 dBA at upper levels of the nearest residential buildings. This is substantially lower than existing ambient noise levels, which exceed 70 dBA near Flower Street.

Ground Floor Restaurant Space

The Project's ground-floor restaurant area would be located entirely within the Project's building envelope. The Project does not propose any outdoor seating with the potential to contribute to increases in surrounding exterior ambient noise levels. However, even if the restaurant were to incorporate outdoor seating, high noise levels associated with Flower Street would almost certainly preclude any potentially significant noise increases from occurring.

Overall, the Project is located in a dense urbanized neighborhood with similar high-intensity land uses and existing noise sources. The Project is consistent with nearby land uses and would not alter the environmental noise profile of its surroundings by a substantial degree. Given these considerations, the impact of the Project's on-site operational noise sources would be **less than significant**.

5.1.4 Off-Site Operational Noise

A previous assessment of a past Project proposal, one that was estimated to result in a net increase of 1,301 daily trip ends, determined that this level of Project traffic would not increase noise levels along nearby roadways by more than 0.1 dBA during either the A.M. or P.M. peak hour. As the current Project design would generate less traffic than this previously studied proposal, it stands to reason that the current design would also have a nominal effect on surrounding roadway noise levels. As such, the Project would have no potential to increase roadway noise levels by at least 3 dBA CNEL, and this impact would be **less than significant**.

5.2 Threshold b):

21 EPA, Speech Levels in Various Noise Environments, May 1977.

Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

5.2.1 Building Damage Vibration Impact

Construction of the Project would require a variety of vehicles, some of which are capable of generating substantial groundborne vibrations. Large earthmoving vehicles such as excavators can produce vibration levels of 0.089 inches per second PPV at a reference distance of 25 feet. Other construction vehicles and equipment would have lesser impacts. The Project would not require impact or vibratory pile driving. **Table 6**, below, shows the Project's estimated vibration impacts at the nearest off-site structures. As shown, the Project would not generate groundborne vibrations in excess of FTA building damage thresholds at the nearest off-site structures. Other structures that are located farther from the identified receptors would experience reduced groundborne vibration levels. As a result, the Project's construction-related vibration impact would be **less than significant**.

Table 6
Building Damage Vibration Levels at Off-Site Structures – Unmitigated

Off-Site Structures	Distance to Project Site (feet)[A]	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant?
City Lights on Fig Apartments	35	I. Reinforced concrete, steel, or timber	0.5	0.061	No
Oviatt Apartments	30	II. Engineered concrete and masonry	0.3	0.073	No
1335 S. Flower St. (Commercial)	10	II. Engineered concrete and masonry	0.3	0.244	No

[A] Distances reflect typical equipment setback and positioning.

Source: NTEC, 2023. Reference vibration levels obtained from the FTA's 2018 Transit Noise and Vibration Impact Assessment manual.

5.2.2 Operational Vibration Impact

During Project operations, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. The Project's related vehicle travel would not be considered a significant source of vibration, as vehicle travel rarely generates perceptible groundborne vibration. As a result, the Project's potential to generate excessive ground-borne vibration levels due to its operations would be **less than significant**.

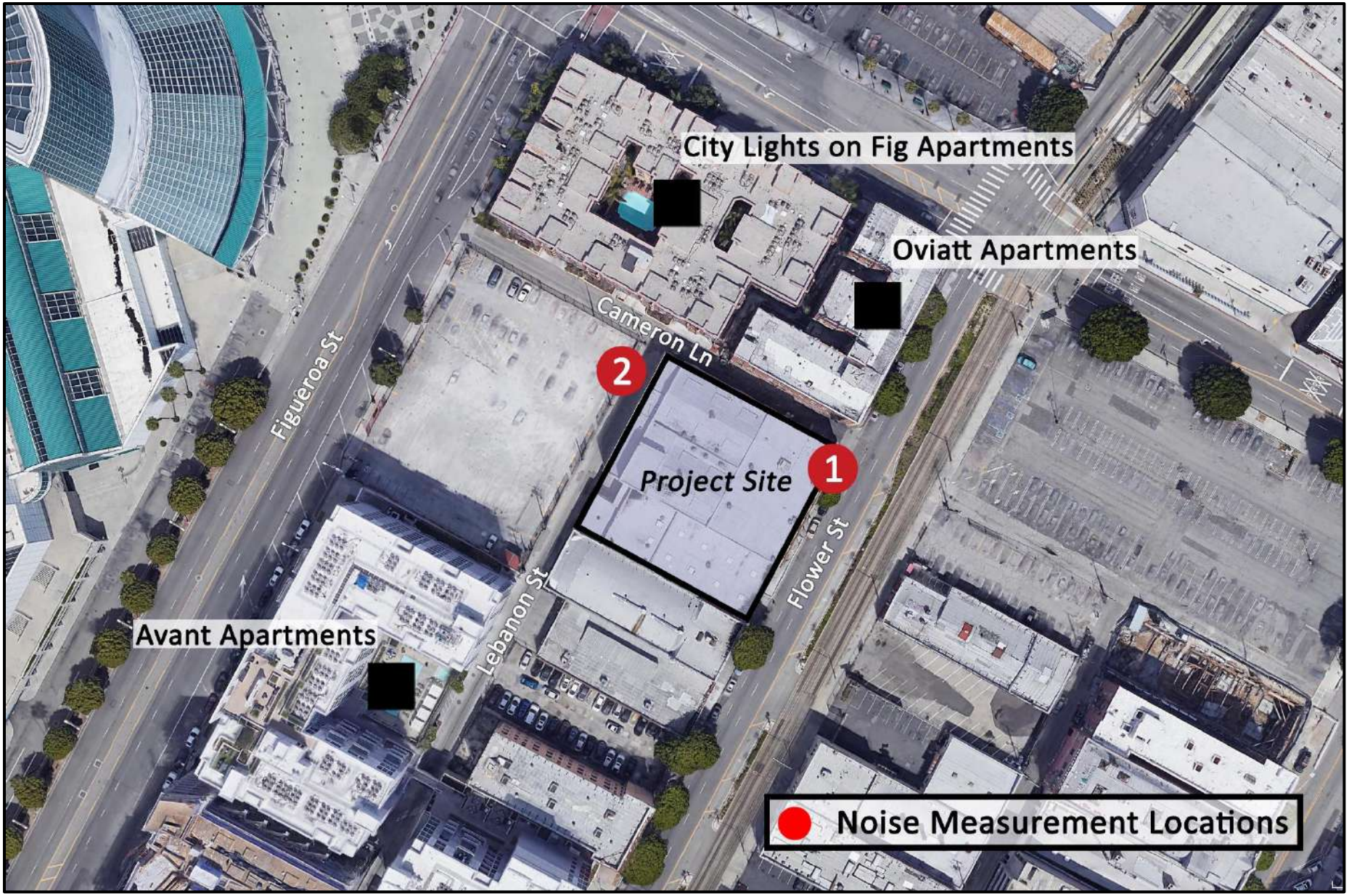
5.3 Threshold c):

For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport

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

The Project is not located within two miles of a public or public use airport and would not expose people residing or working in the project area to excessive noise levels from aircraft. **No impact** would occur.

Appendix A



NOISE RECEPTOR & MONITORING LOCATION MAP

1323 S. Flower Street Project

Imagery via Google

1. Flower Street

Noise Report

Summary

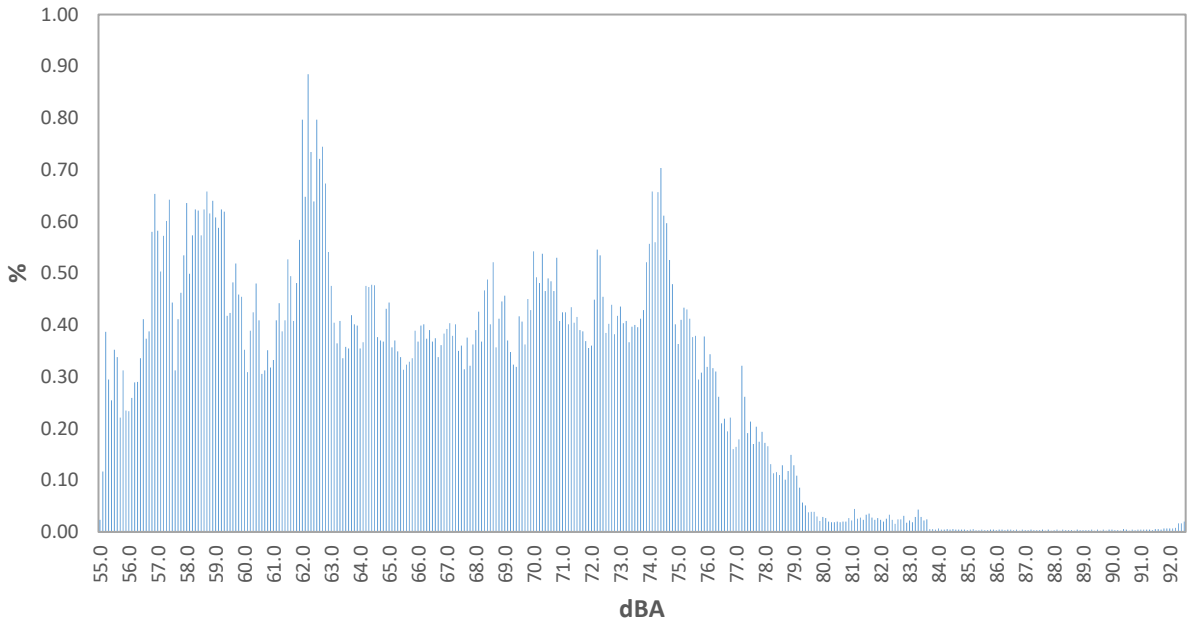
Date	Wednesday, September 1, 2021
Start Time	1:36pm
End Time	1:51pm
File Name	831_Data.049
Device Model	Larson Davis Model 831
Weighting	A
Response	Slow

Results

Description	Value	Description	Value
L_{eq}	72.1dB	L_{10}	75.4dB
L_{max}	92.5dB	L_{50}	66.1dB
L_{min}	55.0dB	L_{90}	57.6dB

LAS > 65.0 dBA (Exceedance Count/Duration): 32, 533.8s
LAS > 85.0 dBA (Exceedance Count/Duration): 1, 3.9s

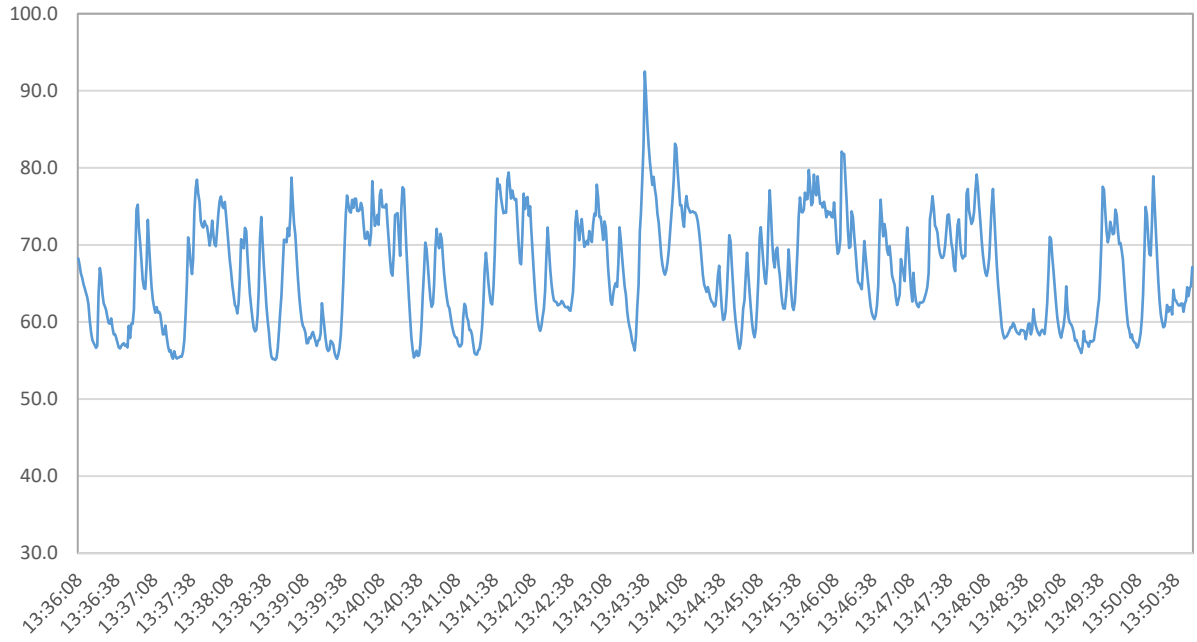
Statistics Chart



Statistics Table

dB	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
55.0	0.02	0.12	0.39	0.29	0.25	0.35	0.34	0.22	0.31	0.23	2.5
56.0	0.23	0.26	0.29	0.29	0.34	0.41	0.37	0.39	0.58	0.65	3.8
57.0	0.58	0.50	0.57	0.60	0.64	0.44	0.31	0.41	0.46	0.53	5.06
58.0	0.64	0.50	0.57	0.62	0.62	0.57	0.62	0.66	0.62	0.64	6.06
59.0	0.61	0.59	0.62	0.62	0.42	0.42	0.48	0.52	0.46	0.45	5.19
60.0	0.35	0.31	0.39	0.42	0.48	0.41	0.31	0.31	0.35	0.32	3.65
61.0	0.33	0.41	0.44	0.39	0.41	0.53	0.49	0.41	0.48	0.56	4.45
62.0	0.80	0.65	0.88	0.73	0.64	0.80	0.72	0.74	0.67	0.54	7.18
63.0	0.48	0.40	0.36	0.41	0.34	0.36	0.35	0.42	0.40	0.40	3.92
64.0	0.35	0.37	0.48	0.47	0.48	0.48	0.38	0.37	0.37	0.43	4.17
65.0	0.44	0.36	0.37	0.35	0.34	0.31	0.32	0.33	0.34	0.39	3.55
66.0	0.37	0.40	0.40	0.37	0.39	0.37	0.37	0.34	0.36	0.38	3.76
67.0	0.39	0.40	0.38	0.40	0.35	0.36	0.31	0.38	0.32	0.36	3.66
68.0	0.39	0.43	0.37	0.47	0.49	0.40	0.52	0.36	0.41	0.45	4.27
69.0	0.46	0.37	0.35	0.32	0.32	0.42	0.41	0.36	0.45	0.43	3.88
70.0	0.54	0.49	0.48	0.54	0.47	0.49	0.48	0.47	0.53	0.41	4.90
71.0	0.42	0.42	0.40	0.43	0.40	0.42	0.39	0.39	0.37	0.36	4.01
72.0	0.36	0.45	0.55	0.53	0.45	0.38	0.40	0.44	0.38	0.42	4.37
73.0	0.44	0.40	0.41	0.37	0.40	0.40	0.40	0.41	0.43	0.52	4.17
74.0	0.56	0.66	0.56	0.66	0.70	0.61	0.60	0.53	0.48	0.40	5.75
75.0	0.36	0.41	0.43	0.43	0.41	0.38	0.38	0.29	0.31	0.38	3.78
76.0	0.32	0.34	0.32	0.31	0.26	0.21	0.22	0.19	0.22	0.16	2.55
77.0	0.16	0.18	0.32	0.26	0.19	0.21	0.17	0.20	0.17	0.19	2.07
78.0	0.17	0.17	0.13	0.11	0.12	0.11	0.13	0.10	0.12	0.15	1.30
79.0	0.13	0.11	0.09	0.06	0.05	0.04	0.04	0.04	0.03	0.02	0.60
80.0	0.03	0.03	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.03	0.22
81.0	0.02	0.04	0.03	0.03	0.02	0.03	0.04	0.03	0.02	0.03	0.29
82.0	0.02	0.02	0.03	0.03	0.02	0.02	0.02	0.02	0.03	0.02	0.24
83.0	0.02	0.02	0.03	0.04	0.03	0.02	0.02	0.01	0.01	0.00	0.20
84.0	0.01	0.00	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.05
85.0	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
86.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
87.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
88.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
89.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
90.0	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.04
91.0	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.01	0.01	0.05
92.0	0.01	0.01	0.01	0.02	0.02	0.02	0.00	0.00	0.00	0.00	0.07

Logged Data Chart



2. Lebanon Street

Noise Report

Summary

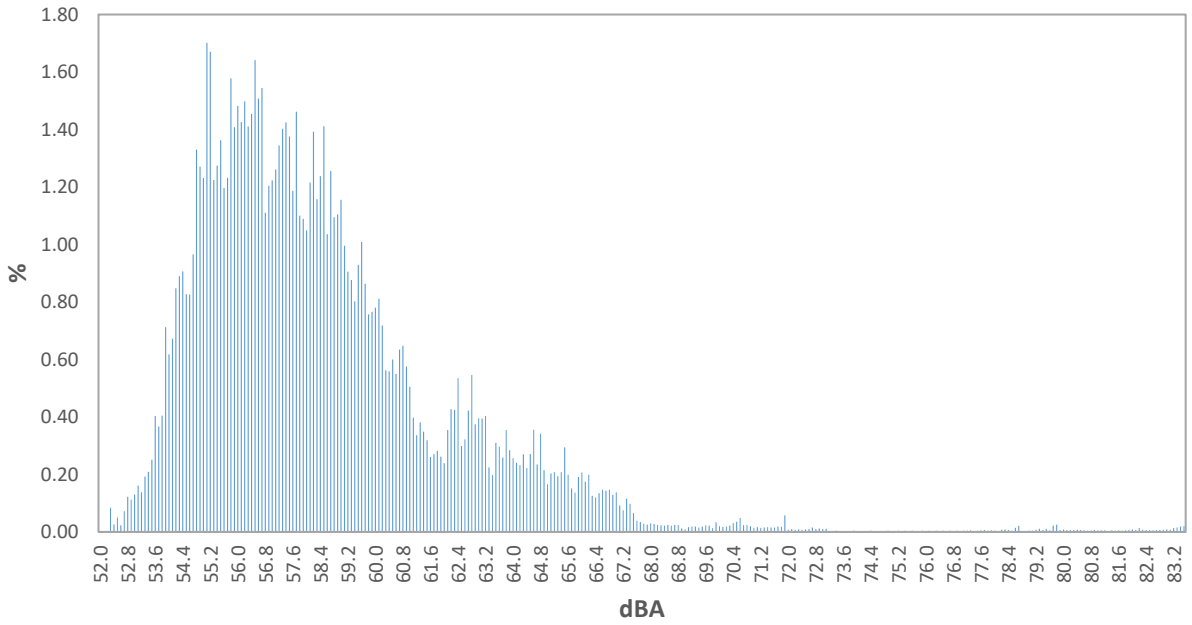
Date	Wednesday, September 1, 2021
Start Time	1:52pm
End Time	2:07pm
File Name	831_Data.050
Device Model	Larson Davis Model 831
Weighting	A
Response	Slow

Results

Description	Value	Description	Value
L_{eq}	62.3dB	L_{10}	63.4dB
L_{max}	83.5dB	L_{50}	57.7dB
L_{min}	52.3dB	L_{90}	54.7dB

LAS > 65.0 dBA (Exceedance Count/Duration): 10, 72.7s
LAS > 85.0 dBA (Exceedance Count/Duration): 0, 0.0s

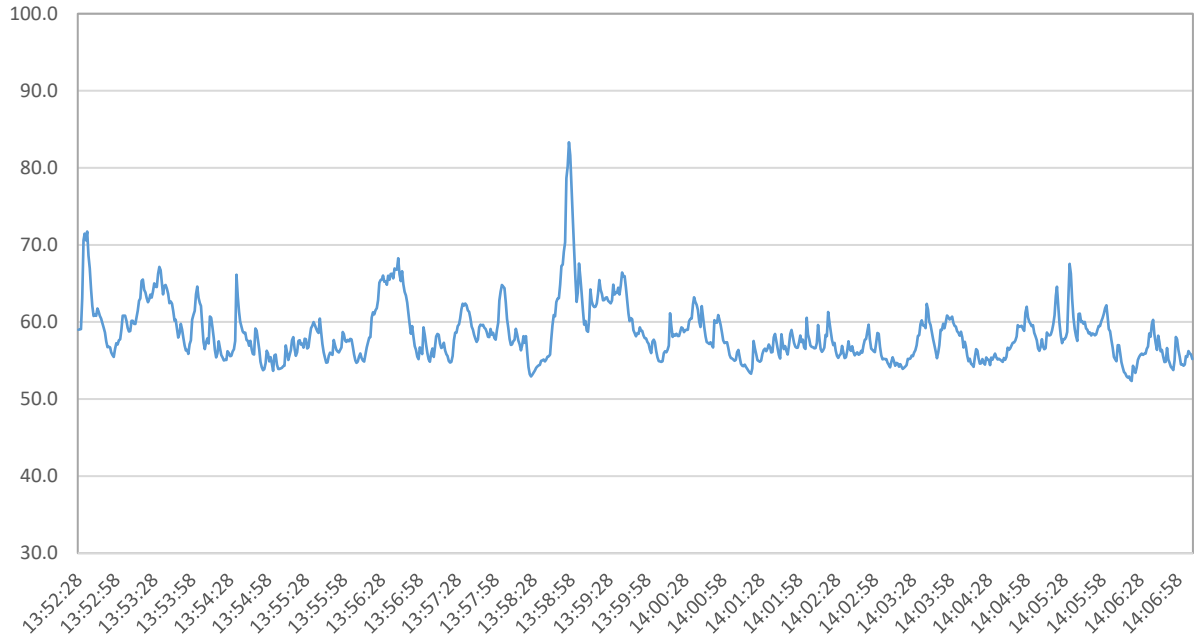
Statistics Chart



Statistics Table

dB	0.0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	%
52.0	0.00	0.00	0.00	0.08	0.03	0.05	0.02	0.07	0.12	0.11	0.5
53.0	0.13	0.16	0.14	0.19	0.21	0.25	0.40	0.37	0.40	0.71	3.0
54.0	0.62	0.67	0.85	0.89	0.91	0.83	0.83	0.97	1.33	1.27	9.15
55.0	1.23	1.70	1.67	1.22	1.27	1.36	1.20	1.23	1.58	1.41	13.88
56.0	1.48	1.43	1.50	1.41	1.45	1.64	1.51	1.54	1.11	1.20	14.28
57.0	1.22	1.26	1.34	1.40	1.42	1.38	1.19	1.46	1.10	1.09	12.87
58.0	1.05	1.22	1.39	1.16	1.24	1.41	1.04	1.26	1.09	1.10	11.95
59.0	1.16	1.00	0.91	0.88	0.80	0.93	1.01	0.86	0.76	0.77	9.06
60.0	0.78	0.81	0.72	0.56	0.56	0.60	0.55	0.63	0.65	0.58	6.44
61.0	0.50	0.40	0.34	0.38	0.35	0.32	0.26	0.27	0.28	0.26	3.36
62.0	0.24	0.35	0.43	0.42	0.53	0.30	0.32	0.42	0.55	0.37	3.94
63.0	0.40	0.39	0.40	0.22	0.20	0.31	0.30	0.26	0.35	0.28	3.12
64.0	0.26	0.24	0.23	0.27	0.22	0.27	0.36	0.23	0.34	0.21	2.64
65.0	0.17	0.20	0.21	0.19	0.21	0.29	0.20	0.15	0.14	0.19	1.95
66.0	0.21	0.17	0.20	0.13	0.12	0.13	0.15	0.14	0.15	0.13	1.53
67.0	0.14	0.09	0.08	0.12	0.10	0.07	0.04	0.03	0.03	0.03	0.71
68.0	0.03	0.03	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.24
69.0	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.02	0.01	0.03	0.19
70.0	0.02	0.02	0.02	0.02	0.03	0.04	0.05	0.02	0.02	0.02	0.26
71.0	0.01	0.02	0.01	0.02	0.02	0.02	0.02	0.02	0.02	0.06	0.20
72.0	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02	0.01	0.01	0.10
73.0	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
74.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
75.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
76.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04
77.0	0.00	0.00	0.00	0.01	0.00	0.00	0.01	0.01	0.00	0.01	0.05
78.0	0.00	0.00	0.01	0.01	0.01	0.00	0.01	0.02	0.00	0.00	0.08
79.0	0.00	0.00	0.01	0.01	0.01	0.01	0.01	0.02	0.03	0.01	0.10
80.0	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.00	0.00	0.01	0.06
81.0	0.01	0.01	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.01	0.05
82.0	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.08
83.0	0.01	0.01	0.01	0.02	0.02	0.02	0.00	0.00	0.00	0.00	0.08

Logged Data Chart



City Lights on Fig Apartments - Lower Level: Demolition and Excavation

Ambient Noise Level:	62.3 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	71.3	0.4	67.3
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	67.3

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	67.3 dBA Leq
Shielding	5 dBA
Ground Factor	0
Unmitigated Construction Noise Level	62.3 dBA Leq
Ambient Noise Level	62.3 dBA
New Noise Level	65.3 dBA Leq
Unmitigated Noise Increase	**3.0 dBA**

City Lights on Fig Apartments - Upper Level: Demolition and Excavation

Ambient Noise Level:	62.3 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	69.0	0.4	65.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	65.0

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	65.0 dBA Leq
Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	65.0 dBA Leq
Ambient Noise Level	62.3 dBA
New Noise Level	66.9 dBA Leq
Unmitigated Noise Increase	**4.6 dBA**

Oviatt Apartments - Lower Level: Demolition and Excavation

Ambient Noise Level:	72.1 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	72.6	0.4	68.6
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	68.6

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	68.6 dBA Leq
Shielding	5 dBA
Ground Factor	0

Unmitigated Construction Noise Level	63.6 dBA Leq
Ambient Noise Level	72.1 dBA
New Noise Level	72.7 dBA Leq
Unmitigated Noise Increase	**0.6 dBA**

Oviatt Apartments - Upper Level: Demolition and Excavation

Ambient Noise Level:	72.1 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	69.8	0.4	65.8
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	65.8

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	65.8 dBA Leq
Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	65.8 dBA Leq
Ambient Noise Level	72.1 dBA
New Noise Level	73.0 dBA Leq
Unmitigated Noise Increase	**0.9 dBA**

Avant Apartments - Lower Level: Demolition and Excavation

Ambient Noise Level:	62.3 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	66.8	0.4	62.8
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	62.8

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	62.8 dBA Leq
Shielding	5 dBA
Ground Factor	0
Unmitigated Construction Noise Level	57.8 dBA Leq
Ambient Noise Level	62.3 dBA
New Noise Level	63.6 dBA Leq
Unmitigated Noise Increase	**1.3 dBA**

Avant Apartments - Upper Level: Demolition and Excavation

Ambient Noise Level:	62.3 dBA Leq

Unmitigated

Equipment Noise Levels

Equipment	Noise Level - dBA Leq	Usage %	Workday Noise Level - dBA Leq
Excavator	66.1	0.4	62.1
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
-	0	1	0.0
		Combined dBA Leq:	62.1

Unmitigated Construction Noise Impact

Combined Equipment Noise Level	62.1 dBA Leq
Shielding	0 dBA
Ground Factor	0

Unmitigated Construction Noise Level	62.1 dBA Leq
Ambient Noise Level	62.3 dBA
New Noise Level	65.2 dBA Leq
Unmitigated Noise Increase	**2.9 dBA**

1323 S. Flower Street Project: Construction Vibration - PPV

Ground Factor (N):	1.1
Equipment:	Large Bulldozer
Equipment PPV (in/sec):	0.089
Reference Distance (ft):	25

Unmitigated

Receptor	Distance (ft)	Vibration Level (in/sec PPV)
City Lights on Fig Apartments	35	0.061
Oviatt Apartments	30	0.073
1335 S. Flower St. - Commercial	10	0.244
	-	-

1323 S Flower - Traffic Noise Analysis

noah tanski environmental consulting

AM Peak Hour

Roadway	Future Without Project	Project Traffic	Future With Project Traffic	Increase (dBA)
Flower St., N of Pico Blvd.	418	0	418	0.0
Flower St., S of Pico Blvd.	649	20	669	0.1
Pico St., W of Figueroa St.	1551	10	1561	0.0
Pico St., W of Flower St.	1226	17	1243	0.1
Venice Blvd., W of Hope St.	811	25	836	0.1
Venice Blvd., E of Hope St.	781	25	806	0.1
-	-	-	-	-

PM Peak Hour

Roadway	Future Without Project	Project Traffic	Future With Project Traffic	Increase (dBA)
Flower St., N of Pico Blvd.	1309	0	1309	0.0
Flower St., S of Pico Blvd.	1667	20	1687	0.1
Pico St., W of Figueroa St.	1835	16	1851	0.0
Pico St., W of Flower St.	1598	25	1623	0.1
Venice Blvd., W of Hope St.	1101	35	1136	0.1
Venice Blvd., E of Hope St.	1058	35	1093	0.1
-	-	-	-	-

Source: Screening analysis conducted pursuant to Caltrans SPL calculation methodology in the Technical Noise Supplement to the Traffic Noise Analysis Protocol (September 2013).

Air Quality Study
March 2023

1323 S. Flower Street Project
1323, 1327, 1331 S. Flower Street, Los Angeles, CA 90015

Prepared by:

CAJA Environmental Services, LLC

9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311

1 Introduction

This report evaluates the air quality impacts that could result from the construction and operations of the 1323 S. Flower Street Project (Project). Supporting documents – such as calculation worksheets and modeling outputs – are included in **Appendix A** to this report.

2 Project Description

The Project Site is located at 1323, 1327, 1331 S. Flower Street in the Central City Community Plan Area of the City of Los Angeles. The 0.52-acre Project Site is bounded by Cameron Lane to the north, Flower Street to the east, commercial uses to the south, and Lebanon Street to the west. The Site is currently developed with a 38,025 square-foot light manufacturing building.

The Project would remove all existing uses and construct an 11-story mixed-use development consisting of a hotel with 100 guestrooms, 48 apartment units, 3,109 square feet of ground floor restaurant space, and 6,476 square feet of rooftop restaurant space.

3 Environmental Setting

3.1 Regulatory Framework

3.1.1 Federal

3.1.1.1 Clean Air Act

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

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in **Table 1**. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and lead.

Table 1
State and Federal Ambient Air Quality Standards and Attainment for L.A. County

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment

Source: Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations. Accessed March 21, 2023.

3.1.2 State

3.1.2.1 California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The State standards and attainment/non-attainment are also shown in **Table 1**.

3.1.2.2 California Air Toxics Program

CARB's Air Toxics Program was established in 1983 in response to the adoption of AB 1807, the Toxic Air Contaminant Identification and Control Act. AB 1807 directs CARB and the State Office of Environmental Health Hazard Assessment (OEHHA) to identify toxic air contaminants (TACs) and determine whether any regulatory action is necessary to reduce their risks to public health. Substances formally identified as TACs include diesel particulate matter and environmental tobacco smoke.

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

Released by CARB in 2005, the *Air Quality and Land Use Handbook: A Community Health Perspective* provides recommendations regarding the siting of new sensitive land uses near potential sources of TACs (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gas stations), as well as the siting of new TAC sources in proximity to existing sensitive land uses.[1] The recommendations are advisory and should not

1 CARB, Air Quality and Land Use Handbook, A Community Health Perspective, April 2005.

necessarily be interpreted as defined “buffer zones”; if a project or sensitive land uses are within the siting distance, CARB recommends further analysis.

3.1.3 Regional

3.1.3.1 South Coast Air Quality Management District

The Project is located within the 6,745-square-mile South Coast Air Basin (Basin). The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for air pollution control in the Basin. Specifically, SCAQMD is responsible for planning, implementing, and enforcing programs designed to attain and maintain CAAQS established by CARB and NAAQS established by the USEPA. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to, the following:

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

3.1.3.2 2022 Air Quality Management Plan

The 2022 Air Quality Management Plan (2022 AQMP) was adopted in December 2022 and represents the most updated regional blueprint for achieving federal air quality standards. It relies on emissions forecasts based on demographic and economic growth projections provided by the Southern California Association of Governments (SCAG) and their 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS).

3.1.3.3 Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties that is tasked with addressing regional issues relating to transportation, the economy, community development, and the environment. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities conform to, and are supportive of, regional and state air quality plan goals to attain NAAQS. Additionally, SCAG is a

co-producer, along with the SCAQMD, of the transportation strategy and transportation control measure sections of the Basin's AQMP. The 2020-2045 RTP/SCS, SCAG's latest long-range plan, continues to recognize that transportation investments and future land use patterns are inextricably linked, and acknowledges how this relationship can help the region make choices that sustain existing resources while expanding efficiency, mobility, and accessibility for people across the region. In short, the 2020-2045 RTP/SCS offers a blueprint for how Southern California can grow more sustainably. To this end, the 2020-2045 RTP/SCS land use pattern continues the trend of focusing new housing and employment in the region's High Quality Transit Areas (HQTAs) and aims to enhance and build out the region's transit network. At the time of the 2016-2040 RTP/SCS, HQTAs accounted for just 3 percent of total land in the SCAG region, but they are projected to accommodate 46 percent of the region's future household growth and 55 percent of the region's future employment growth by 2040.[2] HQTAs are a cornerstone of land use planning best practice in the SCAG region, and studies by the California Department of Transportation, the USEPA, and the Metropolitan Transportation Commission have found that focusing development in areas served by transit can result in local, regional, and statewide benefits including reduced air pollution and energy consumption.

3.1.4 City of Los Angeles

3.1.4.1 General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes six key goals:

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

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

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

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

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

2 SCAG, Final 2016-2040 RTP/SCS, April 2017. HQTAs are defined as areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours.

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

3.2 Pollutants and Effects

3.2.1 State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The following descriptions of each criteria air pollutant and their health effects are based on information provided by the USEPA and the SCAQMD.[3,4]

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the blood stream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O_3

O_3 is a colorless gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X) undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in reduced visibility and a brownish-

3 USEPA, Criteria Air Pollutants, www.epa.gov/criteria-air-pollutants.
4 SCAQMD, Final 2012 Air Quality Management Plan, February 2013.

red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide – SO_2

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter (PM_{10} and $PM_{2.5}$)

The human body naturally prevents the entry of larger particles into itself. However, smaller particles less than 10 microns (PM_{10}) or even less than 2.5 microns ($PM_{2.5}$) in diameter can enter the body and become trapped in the nose, throat, and upper respiratory tract. Here, these particulates may aggravate existing heart and lung diseases, affect the body's defenses against inhaled materials, and damage lung tissue. Those most sensitive to PM_{10} and $PM_{2.5}$ include children, the elderly, and those with chronic lung and/or heart disease.

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

3.2.2 Toxic Air Contaminants - TACs

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[5]

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V)

5 CARB, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.

determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from gas- and diesel-powered vehicle emissions – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.[6] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[7] In addition to its carcinogenic potential, diesel PM may also contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[8]

3.2.3 Volatile Organic Compounds - VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g. NO_X, CO, SO_2…) and contribute to the formation of photochemical smog.

3.3 Existing Conditions

As discussed earlier, the Project is located within the 6,745-square-mile South Coast Air Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. **Table 1**, above, summarizes State and National Ambient Air Quality Standards and the attainment status for Los Angeles County with respect to each criteria pollutant.

3.3.1 Air Quality Monitoring Data

The SCAQMD monitors air quality conditions in 38 source receptor areas (“SRAs”) throughout the Basin. The Project is located in SCAQMD’s SRA No. 1, “Central Los Angeles County.” **Table 2** shows pollutant levels, State and federal standards, and the number of exceedances recorded in SRA No. 1 from 2019 through 2021. The one-hour State standard for O_3 was exceeded 15 times during this three-year period, and the federal standard was exceed 26 times. The 24-hour State standard for PM_{10} was exceeded 30 times. The 24-hour federal standard for $PM_{2.5}$ was

6 CARB, Air Quality and Land Use Handbook: A Community Health Perspective, April 2005.
7 SCAQMD, Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES V), 2021.
8 CARB, Overview: Diesel Exhaust & Health, ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

exceeded 15 times. CO, NO_2, SO_2 and lead levels did not exceed their respective CAAQS or NAAQS during this period.

Table 2
Ambient Air Quality Data – SRA No.1 "Central Los Angeles County"

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2019	2020	2021
Ozone – O_3			
Maximum 1-hour Concentration (ppm)	0.085	0.185	0.099
Days > 0.09 ppm (State 1-hour standard)	0	14	1
Days > 0.070 ppm (Federal 8-hour standard)	2	22	2
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	2.0	1.9	2.0
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.6	1.5	1.6
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO_2			
Maximum 1-hour Concentration (ppm)	0.0697	0.0618	0.0778
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (μm/m^3)	62	77	64
Days > 50 μg/m^3 (State 24-hour standard)	3	24	3
$PM_{2.5}$			
Maximum 24-hour Concentration (μg/m^3)	43.50	47.30	61.0
Days > 35 μg/m^3 (Federal 24-hour standard)	1	2	12
Sulfur Dioxide – SO_2			
Maximum 1-hour Concentration (ppb)	10.0	3.8	2.2
Days > 0.04 ppm (State 24-hour standard)	0	0	0
Lead - Pb			
Maximum Monthly Average Concentration (μg/m^3)	0.012	0.013	0.012
Maximum 3-Month Rolling Averages (μg/m^3)	0.010	0.011	0.012

N/A = data not available
ppm = parts per million of air, by volume
μg/m^3 = micrograms per cubic meter
Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year. Accessed March 21, 2023.

3.3.2 Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is the latest air toxics monitoring and evaluation study conducted in the Air Basin. In short, MATES V is a modeling effort to characterize risk from air toxics across the Air Basin. Based on the MATES V model, the calculated cancer risk from air toxics in the Project's zip code (90015) is approximately 730 in one million, which is well above the Air Basin's average risk of 454 per one million. To put this figure into context, the

air toxics risk in the Project's zip code is higher than it is for approximately 99.0% of the population with the air basin.[9]

The OEHHA, on behalf of the California Environmental Protection Agency (CalEPA), provides a screening tool called CalEnviroScreen that identifies which California communities are disproportionately burdened by, and vulnerable to, multiple sources of pollution. The tool ranks census tracts in California based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors, and prevalence of certain health conditions. According to CalEnviroScreen 4.0, the Project's census tract is ranked 97th percentile. The tract's pollution-specific burden, irrespective of other factors, is ranked 93rd percentile, indicating that its pollution burden is well above average for the State.[10]

3.3.3 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities.

For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours, but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[11] The Project is surrounded by a diverse mix of residential, commercial, retail, office, and other land uses. The nearest sensitive receptors are the three following residential land uses:

- City Lights on Fig Apartments: This multi-family residential building is located at 1300 S. Figueroa Street, approximately 25 feet north of the Project.

- Oviatt Apartments: This multi-family residential building is located at 1315 S. Figueroa Street, approximately 20 feet north of the Project.

9 SCAQMD, Multiple Air Toxics Exposure Study V, MATES Data Visualization Tool, https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23/page/home/?data_id=dataSource_105-a5ba9580e3aa43508a793fac819a5a4d%3A304&views=view_1. Accessed March 28, 2023.

10 Office of Environmental Health Hazard Assessment, CalEnviroScreen 4.0. https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40. Accessed March 28, 2023.

11 SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.

- Avant Apartments: This multi-family residential complex is located at 1340-1500 S. Figueroa Street, approximately 50 feet southwest of the Project.

Other nearby non-sensitive receptors where workers or other users may be present for one to eight or more hours include a multitude of commercial, industrial, retail, and other land uses surrounding the Project Site. The nearest such land uses are warehouse/industrial buildings that are directly south of the Project Site

Receptors that are farther from the Project than the previously identified receptors would experience lesser impacts from the Project's emissions.

3.3.4 Existing Project Site Emissions

The Project Site is currently improved with an approximately 38,000 square foot warehouse. Given the low-intensity nature of this usage, it is likely that the Project Site currently generates minimal emissions related to parking/storage activities and electricity consumption for lighting. The existing warehouse use would be demolished and removed prior to construction of the Project. For the purposes of this analysis, it is conservatively assumed that existing Project Site emissions are negligible, meaning that existing emissions have not been calculated and deducted from the Project's emissions to estimate the Project's "net" emissions impacts.

4 Project Impacts

4.1 Methodology

The following analysis focuses on the potential change in air quality conditions that could result from the Project's construction- and operations-related air pollutant emissions. Specific methodologies used to evaluate these emissions are discussed below.

4.1.1 Construction

Construction of the Project could affect local and regional air quality due to the use of gasoline and diesel-powered construction equipment, as well as the generation of construction vehicle trips. Demolition, grading, and any site preparation activities would also result in fugitive dust emissions. It is important to consider that construction emissions can vary substantially from day to day depending on levels of construction activity, the specific types of construction activities taking place, and the types of vehicles/equipment in use. For dust, the prevailing weather conditions can influence emissions.

Based on the criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if its regional emissions from both direct and indirect construction sources would exceed the threshold levels shown in **Table 3**.

SCAQMD localized significance thresholds (LSTs) are also included below in **Table 3**. LSTs represent the maximum emissions from a project that would not be expected to cause or

contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. They are developed based on the ambient concentrations of a given pollutant for a source receptor and distances to the nearest sensitive receptor. The SCAQMD provides LSTs for NO_X, CO, PM_{10}, and $PM_{2.5}$. The SCAQMD does not provide a LST for SO_2 because land use development projects typically result in negligible construction and long-term operational emissions of this pollutant. Additionally, because VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. However, due to the role that VOCs play in O_3 formation and their classification as a precursor pollutant, a regional emissions threshold has been established. LSTs for the Project were obtained via the SCAQMD's mass rate look-up tables, which are used to determine whether a project may generate significant adverse localized air quality impacts.

The Project's construction-related emissions were estimated using the CalEEMod 2022.1.1.6 model. Modeling results are included in **Appendix A**. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 for fugitive dust, as is mandatory for all construction projects in the Basin.

Table 3
SCAQMD Construction Emissions Thresholds

Criteria Pollutant	Construction Emissions (lbs per day)	
	Regional	Localized[A]
Volatile Organic Compounds – VOCs	75	-
Nitrogen Oxides - NO_X	100	74
Carbon Monoxide – CO	550	680
Sulfur Oxides - SO_X	150	-
Respirable Particulates – PM_{10}	150	5
Fine Particulates – $PM_{2.5}$	55	3

[A] Localized significance thresholds assumed the following:

- 1-acre maximum daily disturbed acreage. This is the smallest project size used for analysis in the LST guidance document and is consistent with the SCAQMD's "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds" document. Utilizing a 1-acre project size for construction results in the most stringent emissions thresholds.
- A receptor distance of 25 meters (approximately 82 feet) was utilized. This is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds.
- The Project is located in SRA No. 1, "Central Los Angeles County."

Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

4.1.2 Operations

The SCAQMD has also established significance thresholds to evaluate potential impacts associated with long-term project operations. Regional thresholds and LSTs for Project operations are shown below in **Table 4**. Operational emissions for the Project were also calculated using CalEEMod 2022.1.1.6.

Table 4
SCAQMD Operational Emissions Thresholds

Criteria Pollutant	Operational Emissions (lbs per day)	
	Regional	Localized[A]
Volatile Organic Compounds - VOCs	55	-
Nitrogen Oxides - NO_X	55	74
Carbon Monoxide – CO	550	680
Sulfur Oxides - SO_X	150	-
Respirable Particulates – PM_{10}	150	2
Fine Particulates – $PM_{2.5}$	55	1

[A] Localized significance thresholds assumed the following:

- 1-acre project size. This is the smallest project size used for analysis in the LST guidance document and results in the most stringent emissions thresholds.
- A receptor distance of 25 meters (approximately 82 feet) was utilized. This is the shortest distance used for analysis in the LST guidance document and results in the most stringent emissions thresholds.
- The Project is located in SRA No. 1, "Central Los Angeles County."

Sources: SCAQMD, Air Quality Significance Thresholds, revised April 2019; and, SCAQMD, LST Methodology Appendix C – Mass Rate LST Look-Up Table, October 2009.

4.1.3 Toxic Air Contaminants (Construction and Operations)

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

4.2 Thresholds of Significance

4.2.1 State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, the Project would have a significant impact related to air quality if the Project would:

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

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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

c) Expose sensitive receptors to substantial pollutant concentrations?

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

4.2.2 SCAQMD CEQA Air Quality Handbook

4.2.2.1 Construction

The following criteria set forth in the SCAQMD's CEQA Air Quality Handbook serve as quantitative air quality standards to be used to evaluate project construction impacts with respect to the Appendix G thresholds. Under these thresholds, a significant impact would occur if:

- Regional emissions from both direct and indirect sources exceed the thresholds shown in **Table 3**, above.
- Maximum on-site daily localized emissions exceed the LSTs also shown in **Table 3**.

4.2.2.2 Operations

The following SCAQMD thresholds serve as quantitative air quality standards to evaluate project operational impacts with respect to the Appendix G thresholds. Under these thresholds, a significant impact would occur if:

- Operational emissions from both on- and off-site sources exceed the regional thresholds shown in **Table 4**, above.
- Maximum on-site daily localized emissions exceed the LSTs also shown in **Table 4**.
- The Project creates an odor nuisance pursuant to SCAQMD Rule 402.

5 Analysis of Project Impacts

5.1 Threshold a):

Would the project conflict with or obstruct implementation of the applicable air quality plan?

5.1.1 SCAQMD 2022 AQMP and SCAG 2020-2045 RTP/SCS Consistency

The following analysis assesses the Project's consistency with the SCAQMD's 2022 AQMP and SCAG's 2020-2045 RTP/SCS. As discussed earlier, the 2022 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in SCAG's 2020-2045 RTP/SCS, which are themselves largely based on local growth forecasts from local governments like the City of Los Angeles; therefore, a project is consistent with the 2022 AQMP, in part, if it is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. The Project Site is classified "C2-2D-O Commercial," which permits the site's proposed hotel, residential, and restaurant land uses. As such, the RTP/SCS's assumptions about population and employment growth in the City accommodate the Project's land uses on this site. The 2020-2045 RTP/SCS assumes a significant increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure. In some cases the 2020-2045 RTP/SCS even projects increases that outpace what is currently anticipated by local general plans. Development of the Project would be consistent with this land pattern and smart growth policies to increase housing and employment density within HQTAs.

Not only would the Project be located within a HQTA, but the Project would be less than a 500-foot walk from Pico Station, which services both the Metro A Line and E Line. The Project would also be located near high quality bus stops at the Pico Boulevard/Flower Street intersection and the Pico Boulevard/Figueroa Street intersection. Public bus transit service in the vicinity of the Project is provided by Metro Local, Metro Rapid, Metro Silver Line, LADOT Commuter Express, LADOT DASH, Santa Monica Big Blue Bus, Orange County Transportation Authority (OCTA), and Torrance Transit. Numerous bus lines at nearby intersections have peak service frequencies of 15 minutes or less during peak commuting hours. Thus, the Project's location provides abundant opportunity for residents, employees, and other users to utilize public transit infrastructure to reduce vehicle trips, specifically vehicle miles traveled (VMT).

Given these considerations, the Project would not result in growth – or accompanying emissions – that are unaccounted for by the 2020-2045 RTP/SCS and the 2022 AQMP.

5.1.2 City of Los Angeles General Plan Air Quality Element

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown below in **Table 5**, the Project would be consistent with the applicable policies of the Air Quality Element.

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

Strategy	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	**Consistent –** The Project would minimize particulate emissions during construction through best practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent –** The Project would not include the development of any unpaved roads or parking lots.
Policy 2.1.1 – Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent –** Future employers could implement these transportation demand management strategies that help reduce traffic congestion, VMT, and subsequently air pollution.

Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors in order to reduce work trips.	**Consistent** – Future employers could implement these telecommunications strategies that help reduce traffic congestion, VMT, and subsequently air pollution.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Consistent –** The Project's proximity to high quality transit options would aid in discouraging single-occupant vehicle use.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent –** Future property managers could implement parking management programs that reduce vehicle travel.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	**Not Applicable –** The Project would not include any facilities for the types of special events referenced by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	**Consistent –** The Traffic Impact Study prepared for the Project by Linscott, Law & Greenspan, Engineers, has determined that the Project would not cause significant impacts to traffic congestion at nearby intersections.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent –** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	**Consistent –** The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent –**The Project would include 20 short term and 56 long term bicycle parking spaces. The Project is also located less than a 400-foot walk from a Metro Bike Share located at the intersection of Pico Boulevard and Flower Street. As discussed earlier, the Project would be located in a HQTA with significant infrastructure to facilitate the use of alternative transportation modes by Project users. Additionally, almost the entire downtown streets network is considered a Pedestrian Enhanced District by the City's Mobility Plan 2035. This plan also designates Figueroa Street a Comprehensive Transit Enhanced Street.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent –** The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent –** The Project would be located in a HQTA with significant infrastructure to facilitate the use of alternative transportation modes by project users.

Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent –** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Source: NTEC, 2023.	

5.1.3 Threshold (a) Summary

To summarize the analysis in response to Threshold (a): (1) Project-related growth would be consistent with 2022 AQMP projections that are themselves based on 2020-2045 RTP/SCS projections; (2) the Project's location in a HQTA and Pedestrian Enhanced District and along existing Metro rail lines would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions; (3) to be discussed below, air emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans, and its impact with respect to Threshold (a) would be **less than significant**.

5.2 Threshold b):

Would the project 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The Project would contribute to local and regional air pollutant emissions during its construction (short-term) and operations (long-term). However, as demonstrated by the following analysis, construction and operations of the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

5.2.1 Construction Emissions

Construction of the Project is anticipated to last approximately 31 months. During this time, a variety of diesel-powered vehicles and equipment would be operated on-site. For example, demolition and grading would require earthmoving vehicles such as excavators.

The Project's unmitigated maximum daily regional and local emissions from construction, as estimated using the CalEEMod 2022.1.1.6 model, are shown in **Table 6**, below. Regional thresholds and LSTs for each air pollutant are also shown for comparison. Because the SCAQMD's regional and localized significance thresholds for construction emissions are

representative of maximum daily emissions that would not be expected to cause or contribute to an exceedance of the most stringent NAAQS or CAAQS for pollutants, the objective of the Project's CalEEMod analysis is to determine whether the Project's maximum one-day construction emissions would have the potential to exceed these thresholds. As such, the Project's CalEEMod analysis relies on conservative construction assumptions in an effort to conclusively rule out the possibility that threshold exceedances could occur. Construction is a dynamic process and day-to-day emissions can vary widely, even within the same construction phase or sub-phase. This analytical approach therefore minimizes the potential for inadvertently underestimating daily construction emissions, which are the basis of SCAQMD's air pollutant thresholds. The likelihood that the maximum daily construction emissions estimated by this analysis would occur on a given construction workday is low; the likelihood that they would occur every day for the duration of a construction phase is zero.

The modeling also accounts for SCAQMD Rule 403 for fugitive dust. SCAQMD Rule 403 contains general requirements applicable to all fugitive dust sources, including the Project's construction, that involve minimizing visible emissions and reducing trackout from site driveways. SCAQMD Rule 403(d)(2) requires all sources to implement "best available control measures" ("BACMs") for fugitive dust. The BACMs, which are included in Table 1 of the regulation, require sources to adopt measures such as pre-watering soils prior to cut and fill activities, stabilizing soils during and after cut and fill activities, and stabilizing disturbed soils with water or other stabilizing agents to prevent the generation of visible dust plumes. Thus, the Project's soil stabilization and trackout reduction procedures would not be required, conducted, or enforced pursuant to any CEQA mitigation: these procedures would be mandatory as a matter of SCAQMD Rule 403 compliance.

The estimated emissions also account for the potential for overlapping phases of construction, such as the overlap of building construction and architectural coatings. The potential for these various overlap periods to result in exceedances of SCAQMD thresholds has been fully analyzed.

As shown, the Project's unmitigated regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Local emissions also would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related emissions impacts on regional and localized air quality would be **less than significant.**

Table 6
Maximum Regional and Localized Daily Construction Emissions (Unmitigated)

	Emissions in lbs per day					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Regional Emissions						
2024	1.6	17.9	17.8	0.1	3.5	1.8
2025	1.3	16.1	16.1	0.1	3.4	1.7
2026	1.1	8.6	15.6	<0.1	1.6	0.6
2027	15.5	8.2	16.2	<0.1	1.8	0.6
Maximum Regional Emissions	15.5	17.9	17.8	0.1	3.5	1.8
Regional Daily Threshold	75	100	550	150	150	55

Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Demolition	1.5	14.6	16.1	<0.1	0.7	0.6
Grading (2024)	1.4	13.0	13.6	<0.1	0.6	0.5
Grading (2025)	1.2	11.4	12.7	<0.1	0.5	0.5
Building Construction (2025)	0.8	7.8	9.8	<0.1	0.3	0.3
Building Construction (2026)	0.8	7.3	9.7	<0.1	0.3	0.3
Building Construction (2027)	0.7	6.9	9.7	<0.1	0.3	0.2
Architectural Coatings (2027)	14.4	<0.1	<0.1	<0.1	<0.1	<0.1
Overlap of Building Construction and Architectural Coatings (2027)	15.1	6.9	9.7	<0.1	0.3	0.2
Maximum Localized Emissions	15.1	14.6	16.1	<0.1	0.7	0.6
Localized Significance Threshold	-	74	680	-	5	3
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**
Source: NTEC, 2023.						

5.2.2 Operations Emissions

Emissions associated with the Project's operations were also calculated using CalEEMod 2022.1.1.6. As shown below in **Table 7**, development of the Project would not introduce any major sources of air pollution. Maximum daily emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's operations-related emissions impacts on regional and localized air quality would be **less than significant**.

Table 7
Maximum Regional and Localized Operational Emissions (Unmitigated)

Emissions Source	Emissions in lbs per day					
	VOC	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	16.4	1.1	32.3	0.1	3.4	3.4
Energy	<0.1	0.7	0.6	<0.1	0.1	0.1
Mobile Sources	3.2	2.2	23.4	0.1	2.0	0.4
Project Regional Emissions[A]	19.7	4.0	56.3	0.1	5.5	3.8
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	4.8	0.9	7.5	<0.1	0.1	0.1
Localized Significance Thresholds	-	74	680	-	2	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[A] Some figures may not add up properly due to rounding.

Source: NTEC, 2023.

5.2.3 Emissions Summary – Health Impact

The Project's construction and operations emissions would not exceed applicable regional thresholds and LSTs. As discussed, SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment. Therefore, neither the Project's construction nor operations emissions would be expected to cause or measurably contribute to adverse health impacts, and the Project's construction and operations emissions impacts on regional and localized air quality would be **less than significant**.

5.3 Threshold c):

Would the project expose sensitive receptors to substantial pollutant concentrations?

5.3.1 Construction Emissions

As discussed previously, the Project's construction emissions would not exceed the SCAQMD's regional significance thresholds. Construction emissions also would not exceed SCAQMD LSTs, meaning that nearby sensitive receptors generally located 25 meters or farther from the Project would not be exposed to substantial pollutant concentrations that would present a public health concern.

The primary TAC generated by the Project's construction activities would be diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology.

However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 31 months, and daily diesel PM emissions would vary considerably day by day, and by phase. As shown earlier, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. And as explained previously, the maximum daily construction emissions are conservative estimates that are not likely to occur on a given construction workday, let alone every day for the entire duration of construction. Given these considerations, TAC emissions from the Project's construction equipment are expected to result in **less than significant** health risk impacts.

5.3.2 Operations Emissions

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

The Project does not propose typical sources of acutely and chronically hazardous TACs, such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. Neither CARB nor the SCAQMD identify the Project's land use types as a source of substantial TAC emissions. As a result, the Project's operations would not warrant the need for a health risk assessment, and this impact would be **less than significant**.

Though the Project would generate traffic that produces and contributes to off-site emissions, Project traffic generation would not result in exceedances of CO air quality standards at nearby roadways due to four key factors. First, CO hotspots are rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to the Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology and the increasing penetration of this technology in the vehicle fleet. No exceedances of CO have been recorded at nearby monitoring stations for some time, and the Basin is currently designated as a CO attainment area for both CAAQS and NAAQS. Third, the Project would not contribute to the levels of congestion and emissions necessary to trigger a potential CO hotspot. Therefore, the Project's potential to expose sensitive receptors to substantial CO concentrations because of CO hotspots would be **less than significant**.

5.4 Threshold d):

Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors are usually 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. The Project will introduce a mixed use (hotel, residential, restaurant) to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e., Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses. Therefore, **no impact** would occur.

Appendix A

1323 S. Flower Street Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	1323 S. Flower Street
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	18.4
Location	34.03955733297735, -118.26751723827041
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4060
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	48.0	Dwelling Unit	0.52	54,553	1,330	—	142	—
Enclosed Parking with Elevator	55.0	1000sqft	0.00	55,000	0.00	—	—	—

Hotel	100	Room	0.00	54,553	0.00	—	—	—
Quality Restaurant	6.00	1000sqft	0.00	6,476	0.00	—	—	—
High Turnover (Sit Down Restaurant)	3.00	1000sqft	0.00	3,109	0.00	—	—	—
Recreational Swimming Pool	1.00	1000sqft	0.00	675	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	15.5	9.07	16.2	0.02	0.34	1.54	1.81	0.31	0.37	0.63
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	15.5	17.9	17.8	0.05	0.69	2.86	3.50	0.64	1.19	1.78
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.82	7.79	10.9	0.02	0.28	1.21	1.49	0.26	0.38	0.64
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	0.52	1.42	1.99	< 0.005	0.05	0.22	0.27	0.05	0.07	0.12

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2025	1.18	9.07	16.1	0.02	0.34	1.32	1.66	0.31	0.32	0.63
2026	1.09	8.48	15.6	0.02	0.30	1.32	1.62	0.27	0.32	0.59
2027	15.5	8.09	16.2	0.02	0.27	1.54	1.81	0.25	0.37	0.62
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2024	1.60	17.9	17.8	0.05	0.69	2.86	3.50	0.64	1.19	1.78
2025	1.31	16.1	15.2	0.05	0.55	2.86	3.41	0.51	1.19	1.70
2026	1.09	8.56	14.8	0.02	0.30	1.32	1.62	0.27	0.32	0.59
2027	15.5	8.21	15.3	0.02	0.27	1.54	1.81	0.25	0.37	0.62
Average Daily	—	—	—	—	—	—	—	—	—	—
2024	0.28	3.27	3.00	0.01	0.12	0.46	0.57	0.11	0.17	0.28
2025	0.86	7.79	10.9	0.02	0.28	1.21	1.49	0.26	0.38	0.64
2026	0.78	6.14	10.7	0.02	0.22	0.93	1.15	0.20	0.22	0.42
2027	2.82	1.92	3.60	0.01	0.06	0.35	0.41	0.06	0.08	0.14
Annual	—	—	—	—	—	—	—	—	—	—
2024	0.05	0.60	0.55	< 0.005	0.02	0.08	0.10	0.02	0.03	0.05
2025	0.16	1.42	1.99	< 0.005	0.05	0.22	0.27	0.05	0.07	0.12
2026	0.14	1.12	1.96	< 0.005	0.04	0.17	0.21	0.04	0.04	0.08
2027	0.52	0.35	0.66	< 0.005	0.01	0.06	0.07	0.01	0.02	0.03

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Unmit.	19.7	3.84	56.3	0.12	3.52	1.98	5.50	3.46	0.35	3.81
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	18.6	3.96	46.9	0.12	3.52	1.98	5.50	3.45	0.35	3.80
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	7.60	3.09	30.1	0.06	0.33	1.98	2.31	0.32	0.35	0.68
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.39	0.56	5.49	0.01	0.06	0.36	0.42	0.06	0.06	0.12

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	3.22	2.05	23.4	0.05	0.03	1.98	2.01	0.03	0.35	0.38
Area	16.4	1.07	32.3	0.06	3.43	—	3.43	3.37	—	3.37
Energy	0.04	0.72	0.55	< 0.005	0.06	—	0.06	0.06	—	0.06
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	19.7	3.84	56.3	0.12	3.52	1.98	5.50	3.46	0.35	3.81
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	3.18	2.24	22.0	0.05	0.03	1.98	2.01	0.03	0.35	0.38
Area	15.3	1.00	24.4	0.06	3.43	—	3.43	3.36	—	3.36
Energy	0.04	0.72	0.55	< 0.005	0.06	—	0.06	0.06	—	0.06
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—

Refrig.	—	—	—	—	—	—	—	—	—	—
Total	18.6	3.96	46.9	0.12	3.52	1.98	5.50	3.45	0.35	3.80
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	3.15	2.26	22.4	0.05	0.03	1.98	2.01	0.03	0.35	0.38
Area	4.41	0.12	7.11	< 0.005	0.24	—	0.24	0.24	—	0.24
Energy	0.04	0.72	0.55	< 0.005	0.06	—	0.06	0.06	—	0.06
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	7.60	3.09	30.1	0.06	0.33	1.98	2.31	0.32	0.35	0.68
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.58	0.41	4.09	0.01	0.01	0.36	0.37	0.01	0.06	0.07
Area	0.80	0.02	1.30	< 0.005	0.04	—	0.04	0.04	—	0.04
Energy	0.01	0.13	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Total	1.39	0.56	5.49	0.01	0.06	0.36	0.42	0.06	0.06	0.12

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.51	14.6	16.1	0.02	0.66	—	0.66	0.60	—	0.60
Demolition	—	—	—	—	—	1.00	1.00	—	0.15	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.92	1.02	< 0.005	0.04	—	0.04	0.04	—	0.04
Demolition	—	—	—	—	—	0.06	0.06	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.17	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.06	0.64	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	3.20	1.08	0.02	0.03	0.70	0.74	0.03	0.19	0.23
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.21	0.07	< 0.005	< 0.005	0.04	0.05	< 0.005	0.01	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.36	13.0	13.6	0.02	0.59	—	0.59	0.54	—	0.54
Dust From Material Movement	—	—	—	—	—	1.70	1.70	—	0.88	0.88
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.55	1.62	< 0.005	0.07	—	0.07	0.06	—	0.06
Dust From Material Movement	—	—	—	—	—	0.20	0.20	—	0.10	0.10
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.28	0.30	< 0.005	0.01	—	0.01	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.04	0.04	—	0.02	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	4.81	1.62	0.03	0.05	1.06	1.11	0.05	0.29	0.34
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	0.01	0.06	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.58	0.19	< 0.005	0.01	0.13	0.13	0.01	0.03	0.04
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.11	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01

3.5. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.24	11.4	12.7	0.02	0.50	—	0.50	0.46	—	0.46
Dust From Material Movement	—	—	—	—	—	1.70	1.70	—	0.88	0.88

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	2.01	2.23	< 0.005	0.09	—	0.09	0.08	—	0.08
Dust From Material Movement	—	—	—	—	—	0.30	0.30	—	0.15	0.15
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.37	0.41	< 0.005	0.02	—	0.02	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.05	0.05	—	0.03	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	4.63	1.60	0.03	0.05	1.06	1.11	0.05	0.29	0.34
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.83	0.28	< 0.005	0.01	0.19	0.19	0.01	0.05	0.06
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	< 0.005	0.15	0.05	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.79	7.81	9.79	0.02	0.33	—	0.33	0.30	—	0.30
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.79	7.81	9.79	0.02	0.33	—	0.33	0.30	—	0.30
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	4.20	5.27	0.01	0.18	—	0.18	0.16	—	0.16
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.77	0.96	< 0.005	0.03	—	0.03	0.03	—	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.36	0.37	5.91	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.89	0.44	0.01	0.01	0.21	0.22	0.01	0.06	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.36	0.41	5.01	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.93	0.44	0.01	0.01	0.21	0.22	0.01	0.06	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.19	0.24	2.83	0.00	0.00	0.59	0.59	0.00	0.14	0.14
Vendor	0.01	0.50	0.24	< 0.005	0.01	0.11	0.12	< 0.005	0.03	0.03
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.52	0.00	0.00	0.11	0.11	0.00	0.03	0.03
Vendor	< 0.005	0.09	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.76	7.30	9.73	0.02	0.29	—	0.29	0.27	—	0.27
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.76	7.30	9.73	0.02	0.29	—	0.29	0.27	—	0.27
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.54	5.22	6.95	0.01	0.21	—	0.21	0.19	—	0.19
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.95	1.27	< 0.005	0.04	—	0.04	0.03	—	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.33	5.48	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.85	0.41	0.01	0.01	0.21	0.22	0.01	0.06	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.37	4.68	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.89	0.42	0.01	0.01	0.21	0.22	0.01	0.06	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.22	0.29	3.50	0.00	0.00	0.78	0.78	0.00	0.18	0.18
Vendor	0.02	0.64	0.30	< 0.005	0.01	0.15	0.16	< 0.005	0.04	0.05
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.05	0.64	0.00	0.00	0.14	0.14	0.00	0.03	0.03
Vendor	< 0.005	0.12	0.05	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	6.92	9.71	0.02	0.26	—	0.26	0.24	—	0.24
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	6.92	9.71	0.02	0.26	—	0.26	0.24	—	0.24
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	1.63	2.28	< 0.005	0.06	—	0.06	0.06	—	0.06
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.30	0.42	< 0.005	0.01	—	0.01	0.01	—	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.29	5.10	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.82	0.39	0.01	0.01	0.21	0.22	0.01	0.06	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.30	0.37	4.32	0.00	0.00	1.11	1.11	0.00	0.26	0.26
Vendor	0.02	0.85	0.40	0.01	0.01	0.21	0.22	0.01	0.06	0.06

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.09	1.07	0.00	0.00	0.26	0.26	0.00	0.06	0.06
Vendor	0.01	0.20	0.09	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.02	0.19	0.00	0.00	0.05	0.05	0.00	0.01	0.01
Vendor	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	14.4	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	14.4	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.56	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	0.47	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	1.02	0.00	0.00	0.22	0.22	0.00	0.05	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.07	0.86	0.00	0.00	0.22	0.22	0.00	0.05	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.16	0.00	0.00	0.04	0.04	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—

High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	0.01	0.12	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

Hotel	0.02	0.35	0.30	< 0.005	0.03	—	0.03	0.03	—	0.03
Quality Restaurant	0.01	0.16	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01
High Turnover (Sit Down Restaurant)	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.04	0.72	0.55	< 0.005	0.06	—	0.06	0.06	—	0.06
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	0.01	0.12	0.05	< 0.005	0.01	—	0.01	0.01	—	0.01
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Hotel	0.02	0.35	0.30	< 0.005	0.03	—	0.03	0.03	—	0.03
Quality Restaurant	0.01	0.16	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01
High Turnover (Sit Down Restaurant)	< 0.005	0.08	0.07	< 0.005	0.01	—	0.01	0.01	—	0.01
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.04	0.72	0.55	< 0.005	0.06	—	0.06	0.06	—	0.06
Annual	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Hotel	< 0.005	0.06	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Quality Restaurant	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
High Turnover (Sit Down Restaurant)	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Recreational Swimming Pool	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.13	0.10	< 0.005	0.01	—	0.01	0.01	—	0.01

4.3. Area Emissions by Source

4.3.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	12.5	1.00	24.4	0.06	3.43	—	3.43	3.36	—	3.36
Consumer Products	2.54	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.09	0.07	7.94	< 0.005	0.01	—	0.01	0.01	—	0.01
Total	16.4	1.07	32.3	0.06	3.43	—	3.43	3.37	—	3.37
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	12.5	1.00	24.4	0.06	3.43	—	3.43	3.36	—	3.36
Consumer Products	2.54	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.26	—	—	—	—	—	—	—	—	—
Total	15.3	1.00	24.4	0.06	3.43	—	3.43	3.36	—	3.36

Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.16	0.01	0.31	< 0.005	0.04	—	0.04	0.04	—	0.04
Consumer Products	0.46	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.05	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.14	0.01	0.99	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	0.80	0.02	1.30	< 0.005	0.04	—	0.04	0.04	—	0.04

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—

Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—

High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—
Hotel	—	—	—	—	—	—	—	—	—	—
Quality Restaurant	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Recreational Swimming Pool	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—

Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	10/1/2024	10/31/2024	5.00	23.0	—
Grading	Grading	11/1/2024	3/31/2025	5.00	107	—
Building Construction	Building Construction	4/1/2025	4/30/2027	5.00	544	—
Architectural Coating	Architectural Coating	2/1/2027	4/30/2027	5.00	65.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	97.0	0.37
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	2.00	8.00	89.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	97.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	2.00	8.00	78.0	0.48
Demolition	Excavators	Diesel	Average	1.00	8.00	158	0.38
Grading	Excavators	Diesel	Average	1.00	8.00	158	0.38
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	78.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	19.0	40.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	28.6	40.0	HHDT

Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	84.9	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	24.8	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	17.0	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	110,470	36,823	96,207	32,069	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	38,000	—
Grading	—	24,472	53.5	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	3	74%	74%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments High Rise	—	0%
Enclosed Parking with Elevator	0.00	100%
Hotel	0.00	0%
Quality Restaurant	0.00	0%
High Turnover (Sit Down Restaurant)	0.00	0%
Recreational Swimming Pool	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	690	0.05	0.01
2025	0.00	690	0.05	0.01
2026	0.00	690	0.05	0.01
2027	0.00	690	0.05	0.01

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year

Total all Land Uses	1,077	1,077	1,077	393,105	7,108	7,108	7,108	2,594,420

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	2
Gas Fireplaces	41
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	5
Conventional Wood Stoves	0
Catalytic Wood Stoves	2
Non-Catalytic Wood Stoves	2
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
110469.825	36,823	96,207	32,069	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00

Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	157,608	690	0.0489	0.0069	476,417
Enclosed Parking with Elevator	203,029	690	0.0489	0.0069	0.00
Hotel	637,337	690	0.0489	0.0069	1,320,764
Quality Restaurant	210,924	690	0.0489	0.0069	613,469
High Turnover (Sit Down Restaurant)	101,260	690	0.0489	0.0069	294,514
Recreational Swimming Pool	0.00	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	1,789,142	22,798
Enclosed Parking with Elevator	0.00	0.00
Hotel	2,536,677	0.00
Quality Restaurant	1,821,202	0.00
High Turnover (Sit Down Restaurant)	910,601	0.00
Recreational Swimming Pool	59,143	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	12.0	0.00
Enclosed Parking with Elevator	0.00	0.00
Hotel	54.8	0.00
Quality Restaurant	5.47	0.00
High Turnover (Sit Down Restaurant)	35.7	0.00
Recreational Swimming Pool	5.70	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Hotel	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Hotel	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Hotel	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Quality Restaurant	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Quality Restaurant	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Quality Restaurant	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

High Turnover (Sit Down Restaurant)	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
High Turnover (Sit Down Restaurant)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0
Recreational Swimming Pool	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Recreational Swimming Pool	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type
—	—

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	7.60	annual days of extreme heat
Extreme Precipitation	5.70	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider different increments of sea level rise coupled with extreme storm events. Users may select from four model simulations to view the range in potential inundation depth for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 50 meters (m) by 50 m, or about 164 feet (ft) by 164 ft.
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A

Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	48.5
AQ-PM	88.8
AQ-DPM	98.8
Drinking Water	92.5
Lead Risk Housing	75.1
Pesticides	0.00
Toxic Releases	81.4
Traffic	90.7
Effect Indicators	—

CleanUp Sites	47.6
Groundwater	71.7
Haz Waste Facilities/Generators	87.5
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	86.1
Cardio-vascular	61.7
Low Birth Weights	69.7
Socioeconomic Factor Indicators	—
Education	80.5
Housing	93.7
Linguistic	84.2
Poverty	93.1
Unemployment	—

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	0.680097523
Employed	32.58052098
Median HI	0.487617092
Education	—
Bachelor's or higher	30.32208392
High school enrollment	100
Preschool enrollment	14.6413448

Transportation	—
Auto Access	0.320800719
Active commuting	99.33273451
Social	—
2-parent households	2.309765174
Voting	1.437187219
Neighborhood	—
Alcohol availability	4.516874118
Park access	42.5895034
Retail density	98.53714872
Supermarket access	52.35467727
Tree canopy	5.877069165
Housing	—
Homeownership	0.153984345
Housing habitability	0.461953035
Low-inc homeowner severe housing cost burden	99.12742205
Low-inc renter severe housing cost burden	55.48569229
Uncrowded housing	7.108943924
Health Outcomes	—
Insured adults	7.083279867
Arthritis	20.2
Asthma ER Admissions	15.8
High Blood Pressure	10.7
Cancer (excluding skin)	80.0
Asthma	6.7
Coronary Heart Disease	4.3
Chronic Obstructive Pulmonary Disease	2.8

Diagnosed Diabetes	1.2
Life Expectancy at Birth	97.0
Cognitively Disabled	7.9
Physically Disabled	4.8
Heart Attack ER Admissions	43.5
Mental Health Not Good	2.2
Chronic Kidney Disease	3.6
Obesity	1.4
Pedestrian Injuries	96.4
Physical Health Not Good	0.5
Stroke	2.9
Health Risk Behaviors	—
Binge Drinking	92.7
Current Smoker	1.8
No Leisure Time for Physical Activity	2.4
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	86.0
Elderly	30.4
English Speaking	9.6
Foreign-born	80.2
Outdoor Workers	84.0
Climate Change Adaptive Capacity	—
Impervious Surface Cover	0.4
Traffic Density	96.8
Traffic Access	87.4

Other Indices	—
Hardship	90.2
Other Decision Support	—
2016 Voting	2.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	97.0
Healthy Places Index Score for Project Location (b)	1.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	See Note A
Construction: Construction Phases	See Note B
Construction: Off-Road Equipment	See Note C

Construction: Trips and VMT	See Note D

1323 S. Flower Street Project

CalEEMod Notes

Note A Lot acreage, building square feet, and other values were set to approximate the Project's site plan. Certain values may differ slightly from the Project's actual values because the CalEEMod "Land Use" input function contains bugs related to the rounding of figures. The differences are nominal and have a negligible effect on the Project's emissions estimates, which are well below SCAQMD thresholds of significance.

Note B Construction phase durations were based on information provided by the Project applicant.

Note C Construction equipment selections were based on information provided by the Project applicant, as well as the consultant's experience with similar projects. For some equipment, CalEEMod default horsepower assumptions were replaced with more conservative default estimates from previous versions of CalEEMod. CalEEMod version 2022.1.1.6 seems to underestimate default horsepower ratings for certain construction equipment.

Note D One-way hauling trip lengths were conservatively assumed to be 40 miles, as this would account for a range of potential receiving landfill locations.