

355 South Grand Avenue
Los Angeles, California 90071-1560
Tel: +1.213.485.1234 Fax: +1.213.891.8763
www.lw.com

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January 6, 2017

VIA EMAIL

Planning and Land Use Management Committee
City of Los Angeles
200 N. Spring Street, Room 430
Los Angeles, CA 90012

Re: 333 S. La Cienega Boulevard Project (Council File Nos.16-1368 & 16-1368-S2)

Dear Chairman Huizar, Vice Chair Harris-Dawson, and Honorable Councilmembers:

On behalf of CRM Properties, we provide for your consideration responses to the appeal filed by the Beverly Wilshire Homes Association in connection with the November 18, 2016 City Planning Commission (“Planning Commission”) determination on the vesting tentative tract map (VTT-74131-1A) and the appeals filed by the Beverly Wilshire Homes Association and SoCal Environmental Justice Alliance on other requested entitlements for the 333 S. La Cienega Boulevard project (the “Project”) (Cases: CPC-2015-896-GPA-VZV-HD-MCUP-ZV-DB-SPR and VTT-74131-1A). The issues raised in the appeals were previously raised and thoroughly responded to in the Final Environmental Impact Report (“EIR”) and the record before the Planning Commission. The following augments the response to some of the issues raised.

The Beverly Wilshire Homes Association (“BWhA”) contends that the Project is not consistent with the City Charter, the General Plan Framework Element or the Wilshire Community Plan. The SoCal Environmental Justice Alliance (“Alliance”) also questions the Project’s consistency with applicable land use plans and policies. Comments regarding the consistency of the Project with the City Charter and land use plans and policies were previously raised and thoroughly addressed in the Final EIR.

General Plan Amendment

BWhA contends that Section 555 of the City Charter “prohibits the City from proposing or approving a general plan amendment for a single parcel of land.” In addition, BWhA argues that the approval of the General Plan amendment and zone change for the Project violate Section 558 of the City Charter, because the “Planning Commission is required to ensure that a requested zone change is consistent with existing requirements imposed by the General Plan.”

Section 555 of the City Charter grants the City Council the authority to amend the General Plan “by geographic areas, provided that the part or area involved has significant social, economic or physical identity.” (City Charter § 555(a)) The Planning Commission made explicit findings with regard to the proposed General Plan Amendment for the Project, including compliance with Section 555 of the City Charter. The Planning Commission found that the Project forms both a physical and economic identity to the area along San Vicente and La Cienega Boulevards that is characterized by larger Regional Center and General Commercial uses, such as the Cedars-Sinai Medical Complex, the Beverly Center and the Beverly Connections shopping centers, for larger commercial, residential and institutional uses in a transit rich area. The Planning Commission also found that the Project area has significant physical identity in that it would provide “much needed publicly accessible open space” and a mixed-use development next to multimodal transit. (Letter of Determination, p. F-8-F-9)

In addition, the Planning Commission made findings demonstrating compliance with City Charter Section 556 and 558, noting that the “amendment promotes the intensity and pattern of development that is consistent with the proposed General Commercial” land use designation. (Letter of Determination, p. F-10) The Planning Commission also noted that the zone change “will create a project site that is consistent and compatible with the nearby commercially zoned properties.” (Letter of Determination, p. F-11) The Planning Commission found that the General Plan amendment changing the Project site’s land use designation was appropriate and that the zone change was necessary to regulate the Project in a manner that is consistent with its underlying land use. (Letter of Determination, p. F-1, F-11) Therefore, the Commission’s approval of the Project is consistent with the requirements of the City Charter.

With regard to the procedural concern expressed in the BWA appeal regarding initiation of the General Plan Amendment, the Los Angeles City Charter authorizes the Director of City Planning, in addition to the City Council and the City Planning Commission, to initiate the process to amend the General Plan. The City’s findings for the Project explain that in compliance with Section 555 of the Los Angeles City Charter, the Director of City Planning proposed the amendment to the Wilshire Community Plan. (Letter of Determination, p. F-9) The City has established a process which allows land owners and members of the public to petition the City to consider a proposed plan amendment; however, the Director of City Planning retains the authority to reject a request or choose to initiate the process to amend the General Plan. This process was followed by the applicant and City Planning in this case.

Spot Zoning

BWA also contends that the zone change for the Project is illegal spot zoning that is not consistent with the General Plan and Wilshire Community Plan. BWA notes that spot zoning that benefits a specific property is only proper where “a substantial public need exists.” (quoting *Foothill Communities Coalition v. County of Orange* (2014), 222 Cal.App. 4th 1302, 1307). BWA argues that while the spot zoning found to be permissible in *Foothill Communities Coalition* met a public need, the zone change for the Project is impermissible.

Zoning decisions are exercises of a local government’s police power to oversee land use development within its jurisdiction. (*Foothill Communities Coalition*, 222 Cal.App. 4th at 1309-

10) The Planning Commission determined that the Project meets a public need and is consistent with the General Plan and Wilshire Community Plan. The Planning Commission found that the zone change was appropriate to ensure that the Project was consistent with nearby properties. (Letter of Determination, p. F-11) The Project replaces an existing, standalone commercial use into a mixed-use residential and commercial development that creates general commercial uses similar to those in the surrounding vicinity, contributes to the concentration of general commercial land uses in the vicinity, and creates new residential uses consistent with the multi-family residential development located directly to the west and other multi-family residential buildings further west and southwest. The Planning Commission also noted that the Project “provides a high-density development near transit lines with high ridership numbers” and contributes “to the available housing stock within the City.” (Letter of Determination, p. F-1) The Project would also “facilitate development of much-needed rental housing,” including affordable housing for Very Low Income and Moderate Income Households. (Letter of Determination, p. F-11). Similar to *Foothill Communities Coalition*, here, the Planning Commission used its discretion to determine that the Project meets the public need of providing additional housing near transit and within the Wilshire Community Plan in an area surrounded by commercial, multi-family residential and institutional uses. Thus, the approval of the zone change for the Project is not illegal spot zoning.

Consistency with Land Use Plans

The General Plan Framework Element provides general guidance related to long-term growth and planning for the City of Los Angeles. The Wilshire Community Plan, which is a component of the General Plan’s Land Use Element, provides area-specific goals, policies, and objectives that apply to the Project site. BWA contends that the Project is inconsistent with the Wilshire Community Plan. The Project is consistent with the overarching goals of the Wilshire Community Plan of providing housing, creating jobs, and utilizing public transportation. The Project is a mixed-use development located adjacent to numerous existing and proposed transit stops that will provide much needed housing to the area, including affordable housing units, and will create jobs.

In particular, BWA contends that the Project is not consistent with Wilshire Community Plan Policy 2-3.1, which states, in part, that the City should “require that new development be compatible with the scale of adjacent neighborhoods.” (Wilshire Community Plan, p. III-11) BWA argues that the Project is not consistent with this objective because the building, at 20-stories, will be taller than surrounding structures, stating that the highest surrounding buildings “are generally eight stories tall.”

BWA cites the 45-foot height limit required by the C2-1VL zone, but there is no height limit included in the Wilshire Community Plan and many surrounding structures are taller than 45 feet as noted in the EIR. For example, the building along San Vicente Boulevard to the north of the Project Site is 185 feet tall, medical office buildings along San Vicente Boulevard are 11- and 12-stories, and the multi-family residential building to the west is 9-stories. While the Wilshire Community Plan includes areas that are single-family residential neighborhoods, the Project site is not located in one of them, but is instead bordered by major streets and nearby

high-density commercial uses. (Wilshire Community Plan Generalized Land Use Map) Thus, the Project is consistent with Objective 2-3.1 of the Wilshire Community Plan.

BWHA also contends that the Project is not consistent with Wilshire Community Plan Objective 1-2, which states that an objective of the plan will be to “reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.” (Wilshire Community Plan, p. III-3) BWHA argues that the Project will result in increased traffic because “the Project would serve higher-income residents who will not utilize public transit.”

The Wilshire Community Plan does not distinguish between housing types or the socioeconomic status of residents, but instead calls for the development of new housing that can utilize existing, and likely potential, commercial centers and transit access points. The Project will provide 145 new residential units, including 14 affordable units, to the area. (Letter of Determination, p. 1) The Project is located in a highly-urban area adjacent to numerous shopping areas, offices, and restaurants. Locating housing in transit rich areas has been demonstrated to reduce vehicle miles traveled and benefit all income groups. (FEIR, 2-34) The Project also includes design elements that would create pedestrian-oriented and bicycle amenities, including 299 bicycle parking spaces and a bicycle lounge, that will encourage use of alternative modes of transportation for neighborhood trips. (Letter of Determination, p. 1)

In addition, the Project provides new residential housing units to an area with substantial access to public transportation. The Project is located in an area that the City of Los Angeles has identified as a Transit Priority Area and SCAG has identified as a High Quality Transit Area and Transit Priority Area. (City of Los Angeles, Department of City Planning, Transit Priority Areas; SCAG, High Quality Transit Area and Transit Priority Area) The Project site is located in a highly transit and pedestrian accessible location with connectivity to many areas within the City, including more than ten bus lines that stop near the Project and the Metro Rapid bus lines that provide service intervals under 15 minutes during peak hours. (DEIR, pp. 4.4-8-4.4-9) The Project is also located within one-half mile of the Wilshire/La Cienega Purple Line subway station that is currently under construction. The Project will develop housing near to a commercial center that will have access to numerous existing bus routes and a future subway station. Therefore, the Project is consistent with Objective 1-2 of the Wilshire Community Plan.

BWHA also argues that the City abused its discretion by allowing the Floor Area Ratio (FAR) increases pursuant to SB 1818, in violation of Proposition U. BWHA contends that the City failed to make the required findings needed to support the increase in FAR. Additionally, BWHA argues that the approval of the SB 1818 incentives circumvent Proposition U’s reduction in the FAR limit allowed in Height District 1.

Under SB 1818, local governments are required to provide developers with density bonuses when a residential project proposes a minimum percentage of lower income units within the development. (CA Govt. Code §§ 65915-65918) The Project is proposing 5 percent of base units for Very Low Income housing units and is therefore eligible to receive incentives that are mandated under SB 1818. Under the City’s Density Bonus Ordinance, the Planning Commission has the discretion to determine which incentives are appropriate for a project. (LAMC §

12.22.A.25) Here, the Planning Commission, in accordance with the City's Density Bonus Ordinance, approved both an on-menu and off-menu density bonus, increasing the Project's FAR to 6:1. As discussed above, the Planning Commission's findings related to compliance with Sections 556 and 558 of the City Charter are sufficient to support the General Plan amendment and zone change, which were the mechanisms used to increase the Project's density in compliance with SB 1818. Finally, while Proposition U did reduce allowable FARs in many zones across the City, it did not prohibit the City from using its legislative authority to grant General Plan amendments and zone changes to accommodate appropriate development, which is what occurred here. (Proposition U, 1986)

Further, as detailed in Attachment A, the Project would be consistent with applicable policies and regulations that have been adopted for the purpose of meeting the State's goals to reduce statewide greenhouse gas (GHG) emissions. The Project is consistent with the goals and policies set forth in AB 32, SB 32, Executive Orders S-3-05 and B-30-15, SCAG's 2016-2040 SCS/RTP, SB 375, applicable provisions of the City's Green Building Code and GreenLA Plan, which are intended to reduce GHG emissions associated with new development. Thus, as indicated in the Initial Study, the Project's GHG impacts would be less than significant and no mitigation is required.

Adequacy of the Environmental Impact Report

The appeal by the Alliance alleges that the environmental analysis for the Project is not adequate and attaches a copy of comments previously submitted by the Alliance on the Draft EIR. Each of the Alliance's comments were fully responded to in the Final EIR. The appeal raises no new issues. Since the publication of the Final EIR, additional Project information has been developed that addresses some of the issues raised in the appeals, as discussed below.

One of the Alliance's comments requested additional information regarding potential project dewatering. In addition to the response to the Alliance's comments included within the Final EIR, based on further planning of the construction of the Project, the following is additional information regarding the potential for dewatering for the Project. As discussed in the EIR, the Project would include construction of two subterranean parking levels to a depth of approximately 20 feet below ground surface (bgs). The historic high water table in the site vicinity is estimated at between 10 and 15 feet bgs. Recent groundwater monitoring at the site detected groundwater (likely a semi-perched zone) at approximately 16 feet bgs. Thus, it is anticipated that temporary dewatering will be required during Project construction. However, permanent dewatering during operation of the Project is not anticipated to be necessary.

A preliminary hydrogeology study of the site indicates that a pumping rate of 0.5 gallons per minute (gpm) would lower the groundwater to about 21 feet bgs and have a radius of influence of about 24 feet from extraction points. (See Attachment B) Thus, dewatering is not anticipated to draw water down across substantial distances, adversely impact the rate or direction of flow of groundwater, or have any drawdown influence on the production rate of water supply wells. Given the limited extent of the dewatering, it is not anticipated to combine with other projects to have a cumulative impact on groundwater. Prior to initiating dewatering at the Project site, additional data would be obtained pursuant to Mitigation Measure HYD-2 that,

with the preliminary hydrogeology study, would assist in the design of the construction period dewatering. As explained in the EIR, the effluent from the dewatering would be discharged pursuant to the applicable permit to be issued by the Regional Water Quality Control Board pursuant to Mitigation Measure HYD-3.

The BWA also contends that the analysis of the potential impacts to fire service in the EIR is not adequate because the information is based on a communication with the Captain of Los Angeles Department Station 61 and the response time and distance to Station 61. In response to a similar comment on the Draft EIR from BWA, the Final EIR provides a detailed response regarding fire services. The EIR explains that a project would have a significant impact on fire protection if it requires the addition of a new fire station or the expansion consolidation or relocation of an existing facility to maintain services. The Fire Department has confirmed that there would be no need to require the expansion of Station 61, nor would the Project require the acquisition of new equipment, facilities or staff to serve the new employees and residents of the Project. With the distance to the existing Station 61 and automatic fire sprinkler system that will be included with the Project, the Project would comply with existing regulations regarding fire safety, reducing potential impacts to less than significant. The Vesting Tentative Tract Map also includes conditions of approval requested by the Fire Department that address fire safety.

BWA questioned the adequacy of the analysis of alternatives to the Project and the Alliance suggested that an offsite location alternative be analyzed. The EIR evaluated a range of alternatives to the Project, including: No Project; Existing Zoning (Option 1 with medical office uses on all floors and Option 2 with ground floor medical office and 2 stories of residential above); and Reduced Density alternatives. In addition, as detailed in the EIR, an All Commercial alternative and an Offsite Location alternative were considered for analysis but rejected as infeasible. Only the No Project alternative would eliminate all of the significant impacts of the Project. While the Existing Zoning alternative would reduce the extent of the construction noise impact, the significant and unavoidable impact of construction noise would remain under the Existing Zoning and Reduced Density Alternative, and the alternatives would not meet the Project objectives.

The City recognized that the Project would result in a significant and unavoidable short-term construction noise impact. Contrary to BWA's contention, the City's finding that the Project benefits outweigh and override the significant and unavoidable impact of the Project is supported by substantial evidence. Based on the EIR, public comments and other evidence in the record, the City found that the Project will: develop an infill site with high-density, mixed use development with much needed rental housing, including affordable housing for Very Low Income and Moderate Income households near employment centers; provide goods and services needed in the community; generate new jobs; reinforce the City's commitment to facilitating a reduction in air quality, GHG and traffic impacts by locating employment-generating land uses and residences in an area served by public transportation; support the City's policies related to encouraging multimodal transit by providing 299 bicycle parking spaces, a bike lounge with direct access to the bicycle lane on the adjacent street, enhancing the bike lanes with conflict markings, adding a bicycle signal request light, and adding an enhanced bus shelter; add new open space; activate the public realm and improve the pedestrian experience by enhancing the existing streetscape, enhancing crosswalks, adding new landscaped medians and a new

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pedestrian crossing; and create a community room with a small meeting room and preparing kitchen for the use of residents and other community members.

CRM Properties is proud of the support that the 333 S. La Cienega Project has received from the community, including the Neighborhood Council, residents, and business and community groups. We appreciate your time and consideration and look forward to presenting the Project to you.

Very truly yours,



George J. Mhlsten
of LATHAM & WATKINS LLP

Enclosure

cc: Luciralia Ibarra, Department of City Planning
Alejandro Huerta, Department of City Planning
Corinne Verdery, Caruso
Sam Garrison, Caruso

Attachment A

Consistency with Applicable Policies and Regulations Adopted for the Purpose of Meeting the State's Goals to Reduce Statewide GHG Emissions

A. Consistency with AB California Global Warming Solutions Act (AB 32) and Scoping Plan Policies

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

Emission reduction measures that could not be initiated in the 2007-2012 timeframe were considered in the Scoping Plan, which was published by CARB in December 2008. The Scoping Plan is defined by AB 32 as “achieving the maximum technologically feasible and cost-effective reductions in GHG emissions from sources or categories of sources of GHGs by 2020.” Scoping Plan measures include direct emission reductions, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and non-monetary incentives for sources for categories. By January 1, 2014 and every five years thereafter, CARB will update its Scoping Plan.

The Climate Change Scoping Plan calls for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions will be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard, and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations will be encouraged and, sometimes, required to use energy more efficiently. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. Additionally, the Climate Change Scoping Plan emphasizes opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent.”

In May 2014, CARB published the First Update to the Climate Change Scoping Plan (First Update), where it revised the previously adopted 1990 GHG emissions level from 427 MMTCO₂e to 431 MMTCO₂e based on the scientifically updated global warming potential (GWP) values in the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report.¹ The total emissions expected in the 2020 BAU (Business as Usual) scenario were also updated from the previously adopted estimate of 596 MMTCO₂e to 509 MMTCO₂e. The updated 2020 BAU scenario includes reductions anticipated from Pavley I² and the Renewables Portfolio

¹The IPCC is the leading international body for the scientific assessment of climate change established in 1988 under the auspices of the United Nations.

²Assembly Bill 1493, passed in 2002, requires the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks,

Standard, which are now adopted into law. The stated purpose of the First Update is to “highlight[...] California’s success to date in reducing its GHG emissions and lay[...] the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.”³ The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32, and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the State realizes the expected benefits of existing policy goals.⁴

In conjunction with the First Update, CARB identified “six key focus areas comprising major components of the State’s economy to evaluate and describe the larger transformative actions that will be needed to meet the State’s more expansive emission reduction needs by 2050.”⁵ Those six areas are: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of the 2050 reduction target. Based on CARB’s research efforts, it has a “strong sense of the mix of technologies needed to reduce emissions through 2050.”⁶ Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

While the Scoping Plan does not provide any specific mandates or policies that would directly affect the Project, the Scoping Plan encourages local municipalities to update building codes and establish sustainable development practices for accommodating future growth. As shown in the table below, the State anticipates it will meet its 2020 GHG emissions limit of 431 MMTCO₂e through reductions in energy, transportation, waste and high-GWP sectors. The Cap-and-Trade Program (addressed in more detail below) provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. Thus, the estimated emission reductions attributed to the Cap-and-Trade Program depend on the emissions forecast. For example, if the emissions forecast increases, the reductions associated with the Cap-and- Trade Program will increase.

and other vehicles used primarily for personal transportation in the State. CARB originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these “Pavley” regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tonnes CO₂e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tonnes CO₂e.

³ CARB, First Update, p. 4, May 2014.

⁴ CARB, First Update, p. 34, May 2014.

⁵ CARB, First Update, p. 6, May 2014.

⁶ CARB, First Update, p. 32, May 2014.

Climate Change Scoping Plan 2020 Emissions Target

Category	2020 CO ₂ e Emissions (MMTOC ₂ e) ^[a]
AB 32 Baseline 2020 Forecast Emissions (2020 BAU)	509
Expected Reductions from Sector-Based Measures	
Energy	- 25
Transportation	- 23
High-GWP	- 5
Waste	- 2
Cap-and-Trade Reductions	- 23 ^[b]
2020 Limit	= 431
^[a] Based on AR4 GWP values. ^[b] Cap and Trade emissions reductions depend on the emission forecast. Source: CARB, First Update to the Climate Change Scoping Plan, (Table 5: meeting the 2020 Emissions Target) May 2014.	

With respect to the Project, a consistency analysis of the applicable policies contained in the AB 32 Scoping Plan that are aimed at reducing GHG emissions associated with new development is presented in the table below, Consistency with Applicable AB 32 Scoping Plan Emission Reduction Measures. As shown below, the Project is substantially consistent with the applicable GHG reduction policies for new development.

Consistency with Applicable AB 32 Scoping Plan Emission Reduction Measures

<p>Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p>Consistent. The projectP with various energy efficiency measures and aspects of the design will be at least 15 percent savings more energy efficient than Title 24-2016 standards. (<i>See, Building Performance Report</i>)</p>
<p>Renewables Portfolio Standard. Achieve 50 percent renewable energy mix statewide.</p>	<p>Not Applicable. The Renewables Portfolio Standard requires all electricity retailers in the state including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators to achieve 20 percent of retail sales from renewable energy sources by the end of 2013, 25 percent by the end of 2016, and the 33 percent requirement being met by the end of 2020. This measure is not directly applicable to development projects but the projectP would derive its retail energy from LADWP, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy consistent with the Renewables Portfolio Standard requirements.</p>
<p>Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.</p>	<p>Consistent. The Project would incorporate green building techniques and other sustainability features. The projectP with various energy efficiency measures and aspects of the design will be at least 15 percent savings more energy efficient than Title 24-2016 standards. (<i>See, Building Performance Report</i>) The Project would also comply with the City’s Los Angeles Green Building Code and the CALGreen Code to ensure that the proposed projectP uses resources efficiently and significantly reduces pollution and waste. (Initial Study, B-44) Thus, the Project would be in compliance with building energy efficiency and green building standards that were adopted in furtherance of the AB 32 Scoping Plan’s goals to expand the use of green building practices.</p>
<p>Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.</p>	<p>Consistent. The projectP would be required to reduce the total estimated waste output through established City diversion and recycling programs. In addition, in compliance with existing City of Los Angeles Department of Building and Safety standards and regulations, the projectP would be required to recycle construction waste to the maximum extent possible. (Initial Study, B-116)</p>
<p>Water. Continue efficiency programs and use cleaner energy sources to move and treat water.</p>	<p>Consistent. The Project would be required to comply with City water conservation measures in landscape, installation, and maintenance, and would be required to comply with the California Green Building Standards Code (CALGreen Code) which is Part 11 of the California Building Standards Code and</p>

	contains standards designed for efficient water use. (Initial Study, p. B-114). The Project will incorporate various indoor and outdoor water efficiency measures, including high efficient fixtures, drip irrigation, and pool/spa recirculating equipment.
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B. Consistency with Executive Order S-3-05 and B-30-15

On April 29, 2015, California Governor Jerry Brown issued Executive Order B-30-15. Therein, Governor Brown:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030;
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets; and
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

CARB subsequently expressed its intention to initiate the Climate Change Scoping Plan update during the Summer of 2015, with adoption currently intended for Spring 2017. A discussion draft of the 2030 Target Scoping Plan Update has been circulated for initial public review and addresses the 2030 reduction targets.

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State’s Executive Branch for the purpose of reducing GHG emissions. The goal of Executive Order S-3-05 is to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). The Project is consistent with the current AB 32 Scoping Plan, discussed further above, that identifies plans and policies for the purposes of complying with the GHG reduction goals set forth in Executive Order S-3-05. The more aggressive goals set forth in B-30-15 have not yet been formally integrated into the Scoping Plan, so it currently is premature to determine if the Project would comply with the specific reduction measures and policies CARB ultimately adopts in the 2030 Target Scoping Plan Update.

As discussed above, the projectP is consistent with the State’s GHG emission reduction efforts under the AB 32 Scoping Plan. Therefore, the projectP does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The 2030 target recently was codified by Senate Bill (SB) 32, but the 2050 goal remains uncodified. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the “measures needed to meet the 2050 are too far in the future to define in detail.”⁷ In the First Update, however, CARB generally described the type of activities required

⁷ CARB, Scoping Plan, p. 117, December 2008.

to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; large scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately.”⁸ Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Project’s impacts further relative to the 2030 and 2050 goals is speculative for purposes of CEQA.

Although the Project’s emissions levels in 2030 and 2050 cannot yet be reliably quantified, statewide efforts are underway to facilitate the State’s achievement of the goals for those years and it is reasonable to expect that operational greenhouse gas emission levels that would be generated by Project would decline in future years as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project’s GHG emissions total at build-out in 2019 represents the maximum emissions inventory as California’s emissions sources are being regulated (and foreseeably are expected to continue to be regulated in the future) in furtherance of the State’s environmental policy objectives. As such, given the reasonably anticipated decline in the Project’s emissions once fully constructed and operational, the Project is consistent with the Executive Orders’ goals.

The Climate Change Scoping Plan recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: “These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate.”⁹ Also, CARB’s First Update “lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050,” and many of the emission reduction strategies recommended by CARB would serve to reduce the Project’s post-2020 emissions level to the extent applicable by law.^{10 11} These emissions reductions strategies include:

- **Energy Sector:** Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce emission levels.¹² Additionally, further additions to California’s renewable resource portfolio would favorably influence the emission levels.¹³

⁸ CARB, First Update, p. 32, May 2014. Website

www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

⁹ Climate Change Scoping Plan at 15.

¹⁰ CARB, First Update, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the “electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles.”].

¹¹ CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

¹² CARB, First Update, pp. 37-39, 85, May 2014.

¹³ CARB, First Update, pp. 40-41, May 2014.

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce emission levels.¹⁴
- **Water Sector:** Emission levels will be reduced as a result of further desired enhancements to water conservation technologies.¹⁵
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the emission levels.¹⁶

In addition to the above strategies, the Cap-and-Trade Program establishes a firm mechanism to ensure the State’s 2020 emissions target is met. While the 2020 cap would remain in effect post-2020,¹⁷ the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.¹⁸ However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The “recommended action” in the First Update for the Cap-and-Trade Program is: “Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target.”¹⁹ The “expected completion date” for this recommended action is 2017.²⁰ CARB has initiated the rulemaking process to extend the Cap-and-Trade Program beyond 2020 and most recently released associated regulatory amendments for public review.²¹

While the AB 32 Cap-and-Trade Program does not directly apply to the projectP, the Cap-and-Trade Program covers GHG emissions associated with electricity consumed in California, whether generated in-state or imported, fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from the production and use of such fuels, and from combustion of other fossil fuels.²² Thus, GHG emissions associated with CEQA projects’ electricity and natural gas usage, and gasoline and diesel usage (related to projects’ mobile source emissions) would be indirectly capped in the aggregate and steadily reduced by the Cap-and-Trade Program. Accordingly, the Project’s GHG emissions in these categories would not be considered cumulatively considerable per the guidance provided in CEQA Guidelines Section 15064(h)(3).

Further, recent studies show that the State’s existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030,

¹⁴ CARB, First Update, pp. 55–56, May 2014.

¹⁵ CARB, First Update, p. 65, May 2014.

¹⁶ CARB, First Update, p. 69, May 2014.

¹⁷ California Health & Safety Code § 38551(a) (“The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.”).

¹⁸ See AB 1288 (Atkins, introduced 2015) that would have eliminated the December 31, 2020, limit on the Cap-and-Trade Program.

¹⁹ CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).

²⁰ Id.

²¹ CARB, Notice Of Public Hearing To Consider Amendments To The California Cap On Greenhouse Gas Emissions And Market-Based Compliance Mechanisms Regulation (December 21, 2016). Website <https://www.arb.ca.gov/regact/2016/capandtrade16/capandtrade16.htm>.

²² 17 CCR Section 95811(b).

and to 80 percent below 1990 levels by 2050.²³ Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given the proportional contribution of mobile source-related GHG emissions to the State's inventory, recent studies also show that relatively new trends, such as the increasing importance of web-based shopping, the emergence of different driving patterns by the "millennial" generation and the increasing effect of Web-based applications on transportation choices, are beginning to substantially influence transportation choices and the energy used by transportation modes. These factors have changed the direction of transportation trends in recent years, and will require the creation of new models to effectively analyze future transportation patterns and the corresponding effect on GHG emissions.

In its Program Environmental Impact Report (PEIR), the Regional Council of the Southern California Association of Governments (SCAG) evaluated the 2016 RTP/SCS in terms of meeting AB 32 GHG emission reduction goals and SB 375 emission targets, and determined the trajectory of the SB 375 GHG emission reductions for the 2016 RTP/SCS would be consistent with the trajectory of the State's long-term (i.e., 2050) GHG emission reduction goals as set forth in Executive Order S-3-05, Executive Order B-16-2012, and Executive B-30-15, as well as the accelerated GHG emission reduction timeline of Executive Order B-30-15. The PEIR explains that the SCAG region will meet and exceed its fair share of GHG emission reductions, as established by CARB.²⁴ Thus, inasmuch as the Project is consistent with the plans, policies and regulations enacted by the State, regional and local entities in furtherance of greenhouse gas reduction efforts, the Project would not conflict with the states implementation of Executive Orders S-3-05 and B-30-15.

C. Consistency with SB 375

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill 375 (SB 375) became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs, and prompts the creation of regional plans to reduce emissions from vehicle use throughout the state. California's 18 Metropolitan Planning Organizations (MPOs) have

²³ Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.

²⁴ Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2015).

been tasked with creating “Sustainable Community Strategies” (SCS) in an effort to reduce the region’s vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State’s 18 MPOs. For the SCAG region, the targets are set at eight percent below 2005 per capita emissions levels by 2020 and 13 percent below 2005 per capita emissions levels by 2035.

SB 375 requires integration of planning processes for transportation, land-use and housing. Under the bill, each MPO is required to adopt a SCS to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SCAG to direct the development of the SCS for the region.

On April 4, 2012, SCAG adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2012–2035 RTP/SCS). Within the 2012-2035 RTP/SCS, the SCS chapter demonstrates the region’s ability to attain and exceed the GHG emission reduction targets set forth by the CARB. The SCS chapter outlines the region’s plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the 2012–2035 RTP/SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The 2012–2035 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. Finally, the 2012–2035 RTP/SCS fully integrates the two sub-regional SCSs prepared by the Gateway Cities and Orange County Council of Governments with the rest of SCAG’s jurisdiction. On June 4, 2012, CARB accepted SCAG’s quantification of GHG emission reductions from the 2012–2035 RTP/SCS and the determination that the 2012–2035 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.²⁵ The Initial Study evaluated the Project’s consistency with the 2012–2035 RTP/SCS and concluded that the Project would not hinder or adversely affect SCAG regional growth management strategies.²⁶

SCAG’s SCS provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a “Complete Streets” policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles,

²⁵ CARB Executive Order G-12-039, www.arb.ca.gov/cc/sb375/exec_order_scag_scs.pdf.

²⁶ Initial Study, Appendix A, at 46.

movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

The SCAG 2016-2040 RTP/SCS was adopted by SCAG on April 7, 2016. The SCAG 2016 RTP/SCS is an update to the 2012-2035 RTP/SCS that further integrates land use and transportation in certain areas so that the region as a whole can grow smartly and sustainably. Between 2015 and 2040, the region is anticipated to experience increases in population, households and jobs. The 2016 RTP/SCS includes land use strategies, based on local general plans, as well as input from local governments, to achieve the AB 32 state-mandated reductions in GHG emissions through decreases in regional per capita VMT. As part of the 2016-2040 RTP/SCS, transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand.

The Project would be consistent with the following key GHG reduction strategies in SCAG's 2016-2040 RTP/SCS which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

By analyzing the performance of land use changes and transportation strategies related to GHG emissions reductions, the 2016-2040 RTP/SCS concluded that GHG emissions per capita in the SCAG region relative to 2005 emissions would be reduced by 8% in 2020, 18% in 2035, and 21% in 2040, which would exceed CARB's required reduction targets. These future GHG goals and conditions would be met in 2040 if investments and strategies detailed in the 2016 RTP/SCS are fully realized.²⁷ Land use strategies included in the 2016-2040 RTP/SCS encourage higher density development in existing urban cores and opportunity areas which would encourage more multi-family and/or mixed-use projects, via vertical development, instead of traditional single-family homes. Compact development and utilization of conservation strategies (i.e. Title 24 building codes, LA Green Building Code), if implemented, would limit energy and water consumption. As discussed further below, the Project is consistent with these growth strategies as the project includes mixed-use residential land uses located on an infill site within a Transit Priority Area as defined by CEQA.

The Project is substantially consistent with the applicable RTP/SCS policies. The Project is located in a highly transit and pedestrian accessible location with connectivity to many areas within the City. The Project would encourage the public to use non-vehicular forms of transit and would include design elements that would create pedestrian-oriented amenities and include bike improvements which would improve travel safety and reliability. Pedestrian and bike

²⁷ SCAG, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, adopted April 2016.

improvements include enhanced streetscapes with walkability and safety improvements, improved crosswalks, and improved bike lanes. In addition, the Project would provide a new and improved transit stop shelter in place of the existing transit stop amenities. The Project would provide multifamily housing and job-creating commercial uses to an existing, transit-accessible area. The Project would provide a variety of dwelling unit sizes, with different bedroom counts that accommodate a range of households. The Project includes numerous energy- and water-efficient design features, which would reduce household consumption.

The City of Los Angeles identifies the Project site as being within a Transit Priority Area per the Department of City Planning's Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.²⁸ Similar to a Transit Priority Area, SCAG defines an area within one-half mile of a rail transit stop or within a transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during commuting hours as a High-Quality Transit Area (HQTA). HQTAs account for only three percent of the total land area in the SCAG region, but are projected to accommodate 46% of the region's future household growth and 55% of the future employment growth.

The Project is located within one-half mile of the Wilshire/La Cienega Purple Line Station that is currently under construction. The Metro Purple Line Westside Extension Section 1, which includes the Wilshire/La Cienega Purple Line Station, is included in SCAG's 2016 RTP/SCS (SCAG 2016 RTP/SCS, Project List Appendix, p. 45). Additionally, there are more than ten bus lines that operate in the near vicinity of the Project site. The corner of La Cienega Boulevard and San Vicente Boulevard, which is within a one-half mile of the Project, is considered a major transit stop. In addition, there are three high-quality transit corridors within one-half mile of the project: Metro Rapid Line 705 runs on La Cienega Boulevard, Metro Local Lines 16 and 316 run on 3rd Street, and Metro Local Line 14 runs on Beverly Boulevard. All of these bus lines provide service intervals under 15 minutes during peak morning and afternoon hours. (DEIR 4.4-8-4.4-9). The City of Los Angeles has also identified the Project location as a Transit Priority Area. (City of LA Dept. of City Planning, Transit Priority Areas, Attachment B).

The Project site is an infill development site that is surrounded on all sides by developed urban land uses and is connected to existing infrastructure. The Project site is currently developed with a three-story building retail building. The Project would be a 294,294 square foot building that will contain 31,055 square feet of commercial space. (Letter of Determination, p. 1). Thus, the development of the Project site would recycle a property that was previously developed and would provide a significant reduction to the GHG emissions which would otherwise be generated if the Project were to be developed on a greenfield site.

D. Consistency with L.A. Green Building Code

As of January 2011, the L.A. Green Code is applicable to the construction of new buildings (residential and nonresidential), building alterations with a permit valuation of over \$200,000, and residential and nonresidential building additions. The L.A. Green Code contains

²⁸ City of Los Angeles, Department of City Planning, Zoning Information File, ZI No. 2452, Transit Priority Areas (TPAs) / Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, website: <http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf>, accessed April 2016.

both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation, meet and exceed Title 24 Standards adopted by the California Energy Commission on December 17, 2008, and meet 50 percent construction waste recycling levels.

The Project would be subject to the City of Los Angeles Green Building Code Ordinance No. 181,480, and would include other energy efficiency features such as landscape and interior water efficiency features and bicycle storage to encourage the use of alternative transportation and improve energy efficiency. (Initial Study, B-124)

The Project's consistency with the L.A. Green Building Code is outlined below.

1. GHG Emissions Associated with Energy Demand

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2014, must comply with the 2013 L.A. Green Building Code standards. The Project includes various components to reduce and minimize to the fullest extent the impact to nonrenewable and renewable resources. The Project would include characteristics that contribute to energy efficiency and reduce the demands for energy resources needed to support Projectthe 's operation. Energy efficient features include, but are not limited to: energy efficiency above that required by Title 24; construction and demolition waste recycling; bicycle storage; storm water treatment features; energy-star rated residential appliances, green roofs to provide open space and reduce solar gain, and HVAC features that improve indoor environmental quality. (Initial Study, B-120)

2. Electric Vehicle Supply Equipment

In 2015, the City of Los Angeles amended the L.A. Green Building Code to incorporate requirements for the installation of electric vehicle charging equipment for new construction (See LAMC 99.04.106.4). The Project would support alternative and electric vehicles via the installation of on-site electric vehicle charging stations in at least five percent of the total code-required parking spaces. In addition, the Project would provide, in at least 20 percent of the total code-required parking spaces, the installation of equipment and wiring that is capable of supporting future electric vehicle supply equipment. (Letter of Determination, p. Q-13) Thus, while not accounted for in the quantification of GHG emissions, the Project would be further consistent with the GHG reduction efforts of AB 32 and the City's LA Green Building Code as it would provide additional support for alternative fuel vehicles.

3. Solid Waste Reduction

In 2011, the legislature adopted AB 341 (Chesbro, Chapter 476, Statutes of 2011), which set a statewide policy goal that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020. The First Update to the Climate Change Scoping Plan estimates that achieving the AB 341 waste reduction goal will result in a yearly GHG reduction of about 20 to 30 MMTCO_{2e}. Consistent with AB 341, the City of Los Angeles approved a Citywide Construction and Demolition (C&D) Waste Recycling Ordinance that requires all mixed C&D waste generated within City limits be taken to City certified C&D waste processors.

The Bureau of Sanitation is responsible for implementing the C&D waste recycling policy that became effective January 1, 2011. All haulers and contractors responsible for handling C&D waste must obtain a Private Solid Waste Hauler Permit from BOS prior to collecting, hauling and transporting C&D waste and C&D waste can only be taken to City Certified C&D Processing Facilities. To ensure compliance with this Ordinance, Building & Safety Building Permit applications require contractors to either identify the Permitted Private Solid Waste Hauler handling C&D waste from their City project or provide the contractor's own Private Solid Waste Hauler Permit should the contractor choose to self-haul C&D waste. Although the benefits of reducing the Project's generation of C&D debris it is not directly quantifiable at the project level, compliance with the Citywide C&D Waste Recycling Ordinance would serve to reduce GHG emissions associated with the generation and disposal of solid waste materials.

The Initial Study concluded that the Project would result in a less than significant impact upon solid waste disposal impacts. In compliance with existing City of Los Angeles Department of Building and Safety standards and regulations, the Project would be required to recycle construction waste to the maximum extent possible. As a part of these regulations, the Applicant would be required to contract for waste disposal services with a company that recycles demolition and/or construction related wastes. During construction temporary waste separation bins would be provided onsite and would be disposed of properly as a part of the Project's regular solid waste disposal program. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. (Initial Study, B-116)

During operation, the Project would generate approximately 2.5 tons of solid waste per week, which is below the City's significance screening criteria threshold for analysis of potentially significant impacts of 5 tons per week. In addition, operation of the Project would be subject to the AB 939 requirements to divert more than 50 percent of solid waste to landfills through source reduction, recycling, and composting. (Initial Study, B-116) As such, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. Thus, with respect to GHG emissions resulting from the operation of the Project, the Project would be equally consistent with the applicable requirements related to source reduction and recycling efforts to minimize the solid waste disposal needs.

4. Bicycle Facilities

In January 2013, the City of Los Angeles adopted Ordinance 182,386 amending Sections 12.03, 12.21, and 12.21.1 of the LAMC to extend bicycle parking requirements to new developments. The Project would provide a total of 299 bicycle parking spaces and a bike lounge. (Letter of Determination, p. F-7) Both long-term and short-term bicycle parking stalls will be provided for residents and visitors in convenient, easily accessible locations. (Letter of Determination, p. F-17-F-18)

The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in vehicle miles traveled and related vehicular GHG emissions. With the provision of better transit options, such as bicycles, commuters will be able to select an option other than driving alone in their

automobiles, further reducing vehicle miles traveled and regional greenhouse gas emissions, which would be consistent with the goals of SCAG's 2016-2040 RTP/SCS of reducing GHG emissions per capita by 8% in 2020, 18% in 2035, and 21% in 2040. The Green LA Plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities.

E. Consistency with Green L.A. Plan

The City's goals and actions aimed at reducing the generation and emission of GHGs from both public and private activities are addressed through the adoption and implementation of the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA Plan). According to the Green LA Plan, Los Angeles is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels by 2020. To achieve this, the City is:

- Increasing the generation of renewable energy;
- Improving energy conservation and efficiency; and
- Changing transportation and land use patterns to reduce dependence on automobiles.

The Green LA Plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. The table below, Consistency with Applicable GHG Emissions Goals and Actions, provides a discussion of the Project's consistency with the GHG-reducing actions from the Green LA Plan. As discussed below, the Project is consistent with the applicable goals and actions of the Green LA Plan.

Consistency with Applicable GHG Emissions Goals and Actions

<p>E6: Present a comprehensive set of green building policies to guide and support private sector development.</p>	<p>The City embarked on an effort to establish green building requirements, paired with incentives, for medium- to large-private projects. Buildings account for a majority of electricity use. Each building site is a microcosm of the environmental issues faced by the City, so addressing each site in a comprehensive manner will provide a variety of environmental benefits.</p>	<p>Consistent. The Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate numerous energy efficiency measures beyond City of Los Angeles and statewide regulatory requirements (Building Performance Report). Thus, the Project would be consistent with City's green building policies</p>
<p>E7: Reduce energy use by all City departments to the maximum extent feasible.</p>	<p>This measure seeks to reduce energy use associated with the operation of streetlights and traffic signals by replacing lights with energy-efficient lighting sources, manage City computers by turning off or placing in standby computers when they are not in use, and implementing other energy saving measures.</p>	<p>Consistent. While this action applies to City departments, the Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate numerous energy efficiency measures beyond City of Los Angeles and statewide regulatory requirements (Building Performance Report). Thus, the Project would be consistent with the City's action to reduce energy use.</p>
<p>E8: Complete energy efficiency retrofits of all City-owned buildings to maximize energy efficiency and reduce energy consumption.</p>	<p>For several years, the City has been meeting aggressive environmental standards for its new construction program, but has now also identified energy saving opportunities for 497 of the existing Council-controlled buildings that it owns and operates.</p>	<p>Consistent. While this action applies to City-owned buildings, the Project would be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code. The Project would incorporate numerous energy efficiency measures beyond City of Los Angeles and statewide regulatory requirements (Building Performance Report). Thus, the Project would be consistent with the City's action to reduce energy use.</p>
<p>E9: Install the equivalent of 50 "cool roofs" on new or remodeled City buildings.</p>	<p>Designed with high albedo (reflectivity) to reflect the sun's heat, cools roofs can provide energy saving to buildings and also help reduce the urban heat island</p>	<p>Consistent. While this action applies to City-owned buildings, the Project would include green roofs to provide open space and reduce solar gain. (Initial Study, B-120) The Project</p>

	effect. Green or vegetated roofs provide the same benefits, with the additional benefits of green space and reduced stormwater runoff.	would be consistent with the City's action to install cool roofs on new buildings.
E13: Distribute two compact fluorescent light (CFL) bulbs to each of the 1.4 million households in the City.	To reduce energy consumption and related CO ₂ emissions, the LADWP will purchase 2.4 million compact fluorescent light bulbs (CFLs) and distribute two bulbs to each of the City's 1.2 million households.	Consistent. While this action applies to LADWP, the Project would incorporate various energy efficiency measures, including efficiency lighting design. (Building Performance Report) The Project would be consistent with the City's action to provide energy efficient lighting to City residents.
E14: Increase the level and types of customer rebates for energy efficient appliances, windows, lighting, and heating and cooling systems.	Through implementation and aggressive promotion of existing non-residential energy efficiency programs in LADWP's service territory, energy consumption and related GHG emissions will continue to be reduced. LADWP will work closely with professional organizations, chambers of commerce, contractors, and vendors to promote energy efficiency and encourage businesses to retrofit with new efficient technologies.	Consistent. The Project would incorporate various energy efficiency measures, including energy-star rated residential appliances. (Initial Study, B-120). The Project would be consistent with the City's action to provide energy efficient lighting to City residents. The Project would be consistent with the City's action to encourage building energy efficiency.
E15: Increase the distribution of energy efficient refrigerators to qualified customers.	To facilitate energy conservation among customers who receive low-income rate assistance (Rates 06 and 86), LADWP intends to offer up to 50,000 new energy-efficient refrigerators, in exchange for the customers' older, less-efficient refrigerators.	Consistent. The Project would incorporate various energy efficiency measures, including energy-star rated residential appliances. (Initial Study, B-120). The Project would be consistent with the City's action to provide energy efficient lighting to City residents. The Project would be consistent with the City's action to provide energy efficient appliances to City residents.
W1: Meet all additional demand for water resulting from growth through water conservation and recycling.	The Mayor's Office and LADWP developed the <i>Securing LA's Water Future</i> plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: 1. Enforcing prohibited uses of	Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water efficiency measures. The Project would include the installation of high efficient fixtures, drought-tolerant plant species, efficient irrigation systems, and pool/spa recirculating filtration equipment. As a result, the Project would be consistent with the applicable short- and long-term water

	<p>water (levying fines and sanctions against water abusers and increase water conservation awareness).</p> <ol style="list-style-type: none"> 2. Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle). 3. Extending outreach efforts, water conservation incentives, and rebates. 4. Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). <p>Long-Term Conservation Strategies:</p> <ol style="list-style-type: none"> 1. Increasing water conservation through reduction of outdoor water use and new technology. 2. Maximizing water recycling. 3. Enhancing stormwater capture 4. Accelerating clean-up of the groundwater basin. 5. Expanding groundwater storage. 	<p>conservation strategies.</p>
<p>W2: Reduce per capita water consumption by 20%.</p>	<p>See W1, above.</p>	<p>See W1, above.</p>
<p>W3: Implement the City’s innovative water and wastewater integrated resources plan that will increase conservation, and maximize use of recycled water, including capture and reuse of stormwater.</p>	<p>See W1, above.</p>	<p>See W1, above.</p>
<p>T1: Require 85% of City fleet to be powered by alternative fuels.</p>	<p>To reduce both air pollution and GHG emissions, City Departments will continue to acquire alternative fuel and advanced technology vehicles to replace those powered by conventional fuels.</p>	<p>Consistent. While this action primarily applies to the City and LADWP, the Project would support alternative and electric vehicles via the installation of on-site electric vehicle charging stations in at least five percent of the total code-required</p>

		parking spaces. In addition, the Project would provide, in at least 20 percent of the total code-required parking spaces, the installation of equipment and wiring that is capable of supporting future electric vehicle supply equipment. (Letter of Determination, p. Q-13)
T4: Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	Consistent. The Project's traffic study included an analysis of traffic impacts from construction and operation of the Project and found that impacts to intersection traffic would be less than significant. (DEIR, p. 4.4-45-4.4-46) As a result, the Project would be consistent with this action.
T6: Make transit information easily available, understandable, and translated into multiple languages.	A Los Angeles Department of Transportation (LADOT) partnership with the Personnel Department and ELA will enable DOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated greenhouse gas emissions.	Consistent. While this action applies to LADOT, the Project will coordinate with Los Angeles County Metropolitan Transportation Authority to install a new bus shelter with amenities that include real-time informational display. (Letter of Determination, p Q-2)
T8: Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with single occupancy vehicles (SOVs). As described in Action Items LU1 and LU2, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	Consistent. The Project would provide a total of 299 bicycle parking spaces and a bike lounge. (Letter of Determination, p. F-7) Both long-term and short-term bicycle parking stalls will be provided for residents and visitors in convenient, easily accessible locations. (Letter of Determination, p. F-17-F-18) The Project would locate residential uses within an area that has public transit (with access to the planned Wilshire/La Cienega heavy-rail station and numerous bus lines), employment opportunities, restaurants and entertainment all within walking distance. (SCAG 2016 RTPSCS, Project List Appendix, p. 45, DEIR 4.4-8-4.4-9) As a result, the Project

		would be consistent with this action.
<p>LU1: Promote high-density housing close to major transportation stops (same as Action Items LU3 and LU6).</p>	<p>Promoting higher density housing in areas close to transportation stops is an important component of the City's General Plan. Higher density housing with good access to transit helps accommodate the City's growing population and helps relieve traffic congestion, by increasing ridership on public transit.</p>	<p>Consistent. The Project site represents an urban/compact infill location. The Project would be located in a highly walkable area served by frequent and comprehensive transit within a quarter-mile of the Project site, including existing Metro bus routes and the Metro Purple Line under construction. SCAG 2016 RTPSCS, Project List Appendix, p. 45, DEIR 4.4-8-4.4-9) The Project would also provide parking for 299 bicycles on-site to encourage utilization of alternative modes of transportation. (Initial Study, A-22) As a result, the Project is consistent with this City action.</p>
<p>LU2: Promote and implement transit-oriented development (TOD).</p>	<p>Transit Oriented Districts (TODs) represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.</p>	<p>Consistent. The Project would co-locate complementary commercial and residential land uses in close proximity to existing off-site commercial and residential uses. The Project would be located in a highly walkable area served by frequent and comprehensive transit within a quarter-mile of the projectP site, including existing Metro bus routes and the Metro Purple Line under construction. (SCAG 2016 RTPSCS, Project List Appendix, p. 45, DEIR 4.4-8-4.4-9) The increases in land use diversity and mix of uses on the Project site would reduce vehicle trips and vehicle miles traveled by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions. As a result, the Project is consistent with this City action.</p>
<p>LU3: Make available underutilized City land for housing and mixed-use development.</p>	<p>The City can leverage the value of its real estate assets, whether developed and unimproved lands, to further Smart Growth policies such as improving access to transportation, strengthening job/housing linkages, reducing vehicle trips, providing non-traditional open space such as</p>	<p>Consistent. While this action applies to City-owned land and facilities, the Project would be consistent. The Project would co-locate complementary commercial and residential land uses in close proximity to existing off-site commercial and residential uses. The Project would be located in an area</p>

	linear networks, and parkland that is built upon freeway covers.	accessible to alternative forms of transportation including walking, bicycling, and transit. The Project further includes roof-top terraces. As a result, the Project is consistent with this City action.
LU4: Make available underutilized City land for parks and open space.	See LU3, above.	See LU3, above.
LU6: Make available underutilized City land within 1,500 feet of transit for housing and mixed-use development.	See LU3, above.	See LU3, above.
WsT1: Reduce or recycle 70% of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	Consistent. The Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles <i>Zero Waste Progress Report</i> (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012.
OS/G1: Create 35 new parks.	Parks and their trees, shrubs and other vegetation help mitigate climate change impacts by absorbing CO ₂ and releasing oxygen into the atmosphere.	Consistent. The Project would provide landscaped areas for the public, residents, and visitors. As a result, the Project would be consistent with this action.
OS/G3: Plant 1 million trees throughout Los Angeles.	The Mayor launched the “Million Trees LA” (MTLA) Initiative in September 2006. The initiative is rooted in the idea that natural processes can reduce pollution and transform our city into a sustainable, green city. The one million new trees will provide shade and reduce energy costs, clean the air, absorb the GHGs that cause global warming, capture polluted urban runoff, improve water quality, provide homes for wildlife, and add beauty to neighborhoods.	Consistent. The Project would plant at least 62 24-inch box trees. (Letter of Determination, p. F-28) As a result, the Project would be consistent with this action and help the City to achieve its goal.
OS/G5: Identify and develop promising	Stormwater infiltration is a Best Management Practice (BMP) that	Consistent. The Project would incorporate landscape contouring that

<p>locations for stormwater infiltration to recharge groundwater aquifers.</p>	<p>mirrors the natural process of infiltration found in undeveloped (or natural) watersheds. Where site conditions allow, a portion of urban stormwater runoff can be managed through infiltration, to effectively increase the volume of water returned to the soil and reduce the volume of direct runoff to streams and sewers. Increased infiltration also improves flood protection and aids in meeting local water demand by helping to recharge (replenish) underground aquifers.</p>	<p>would minimize stormwater runoff. As a result, the Project would be consistent with this action.</p>
<p>OS/G6: Collaborate and partner with schools to create more parks in neighborhoods.</p>	<p>See OS/G1, above.</p>	<p>See OS/G1, above.</p>

Attachment B

Preliminary Hydrogeologic Testing Report
333 S. La Cienega Boulevard

January 06, 2017

CRM Properties, Inc.
101 The Grove Drive
Los Angeles, CA 90036

**RE: PRELIMINARY HYDROGEOLOGIC TESTING REPORT
333 S. LA CIENEGA BOULEVARD
LOS ANGELES, CA 90048**

Tetra Tech BAS (Tetra Tech) has prepared this letter report of preliminary hydrogeological testing and estimates of potential dewatering for the proposed development at 333 S. La Cienega Boulevard, Los Angeles, California (Site). The proposed Site development includes underground parking structures to a depth of approximately 20 feet below ground surface (bgs). The additional hydrogeologic data of the Site aquifer was obtained via an aquifer pump test in anticipation of potential dewatering during redevelopment of the property. Long-term operational dewatering is not anticipated to be necessary.

PERTINENT REGIONAL AND SITE HYDROGEOLOGY

The Site is located within the Hollywood Subbasin of the Coastal Plain of Los Angeles Groundwater Basin (California Groundwater Bulletin 118, 2016). The Hollywood Subbasin is bounded on the north by Santa Monica Mountains and the Hollywood fault, on the east by the Elysian Hills, on the west by the Inglewood fault zone, and on the south by the La Brea High, formed by an anticline that brings impermeable rocks close to the surface. Based on the Site location on the southern border of the Hollywood Subbasin, it is likely that it lies above the anticline feature. Throughout much of the Hollywood Subbasin, the near-surface Bellflower aquiclude creates local, discontinuous, semi-perched groundwater conditions in the shallow subsurface. The hydrologic testing documented in this report was conducted in this shallow, semi-perched groundwater zone. Groundwater in the Hollywood Subbasin generally flows westward toward the Inglewood Fault; however, localized flows may vary. The exact groundwater gradient and direction at the Site has not been determined.

A review of previous investigations at the Site (Excel Environmental and General Engineering, 1991a and 1991b) indicates that the subsurface soils to 20-feet bgs consist of interlayered sands, silty clay, gravel, clay and silty sandy clay.

Groundwater at the Site is not pumped for beneficial uses. No groundwater production wells or public water supply wells are located on or associated with the Site. The nearest groundwater production wells are located approximately 0.85 mile northwest of the site.

GROUNDWATER WELL INSTALLATION

Three groundwater monitoring wells were installed at the Site to conduct an aquifer pump test to obtain additional information regarding the hydraulic conductivity and potential pumping rates in anticipating of dewatering at the Site. The following documents the field activities performed by Tetra Tech and its subcontractors in connection with this assessment.

Prior to well installation, well construction permits were obtained from the Los Angeles County Department of Public Health and the area cleared for potential subsurface obstructions. The

groundwater well installation was conducted under Dig Alert Ticket No. A63440447 and Los Angeles County Department of Public Health Permit No. SR0091111.

On December 12, 2016, Tetra Tech provided oversight to its private utility locating subcontractor, Spectrum Geophysical (Spectrum), in clearing 3 proposed groundwater monitoring well locations of subsurface utilities and obstructions at the subject Site.

On December 13 and 14, 2016. Tetra Tech provided oversight of its subcontractor, Core Probe International, Inc. (Core Probe), in drilling 3 direct-pushed borings (Pumping Well-1 [PW-1], Observation Well-1 [OBS-1] and Observation Well-2 [OBS-2]) for installation as groundwater monitoring wells at the approximate locations shown on Figure 1. Prior to direct-push activities with a Geoprobe rig, each boring location was cored and cleared via hand auger to 5-feet bgs for underground obstructions.

PW-1, was drilled to a total depth of 30-feet bgs. Twenty-five feet of 2-inch pre-packed screen was installed in the boring, as well as 5-feet of blank PVC casing. In completing PW-1, a foot of Monterey sand, a foot of dry bentonite and 2.5-feet of bentonite grout were installed. OBS-1 was drilled approximately 12-feet west of PW-1, to a total depth of 25-feet bgs. The well was set at 24.5-feet bgs. OBS-1 was constructed with 20-feet of 2-inch pre-packed screen, 5-feet of blank PVC casing, a foot of Monterey sand, a foot of dry bentonite and 2.5-feet of bentonite grout. OBS-2 was drilled approximately 8-feet west of OBS-1 and 20-feet west of PW-1, to a total depth of 25-feet bgs. The well was set at 23.5-feet bgs. OBS-2 was constructed with 20-feet of 2-inch pre-packed screen, approximately 3.5-feet of blank PVC casing, a foot of Monterey sand, 0.5-feet of dry bentonite and 2.5-feet of bentonite grout. All three wells were finished with 8-inch well covers installed at ground surface.

The soil borings were observed for lithologic description. Logged soils in the observation well borings consisted of clayey sands and silts to 18-feet bgs and coarser sandy material below 18-feet bgs.

GROUNDWATER WELL DEVELOPMENT

On December 19, 2016, Tetra Tech provided oversight of Core Probe in developing the previously installed groundwater wells, PW-1, OBS-1 and OBS-2. The three wells were swabbed and pumped until visibly free of sealant materials, turbid fluids, large amounts of settleable solids and formation materials. Depth to water was measured in the three wells at approximately 16 feet bgs immediately prior to the pump test, as shown on Table 1 at time 0.

AQUIFER PUMP TEST

The aquifer pump test was performed by Tetra Tech on December 20, 2016, with a Grundfos Redo-Flo #2 electric submersible pump operated by Core Probe. The pump was installed at the bottom of PW-1 at approximately 29.8-feet below top of casing (bTOC), or approximately half a foot from the bottom of the well casing. Static water levels were recorded with water level meters at pumping well PW-1, and observation wells OBS-1 and OBS-2, prior to the start of the pump test.

Initially, the pump was started at a flow rate of 0.75 gallons per minute (gpm), causing the groundwater well to dewater within 27-minutes. The pump was shut off and the pumping well and two observation wells were allowed to recover within 90% of their initial static water levels.

Once acceptable water levels were achieved, the pump in PW-1 was re-started at a constant flow rate of 0.5 gpm. Groundwater levels were recorded with water level meters at PW-1, OBS-1 and OBS-2 at various intervals for a total of four continuous hours. At the end of four hours, the pump was turned off and water levels were recorded at each well during the following hour, while the groundwater levels recovered from the pump test. All equipment was pulled from the groundwater wells and decontaminated.

INVESTIGATION DERIVED WASTE

Investigation-derived waste including soil cuttings, decontamination water and extracted pump test groundwater were containerized in Department Of Transportation-approved 55-gallon drums, properly labeled and stored onsite pending chemical characterization and subsequent disposal by Tetra Tech. The drums will be removed from the Site for disposal in accordance with applicable federal and local regulations.

AQUIFER PUMP TEST RESULTS

The results are tabulated in Table 1 and shown graphically in Figures 2 through 4. The drawdown and recovery curves for both the 0.75 gpm and the 0.5 gpm flow rates are shown graphically in Figures 2 and 3, respectively. Both curves exhibit the classic "S" curve indicative of an unconfined aquifer (not overlain by a confining, impermeable aquitard), likely a semi-perched zone, with an initial steep drawdown curve followed by a shallower curve as dewatering accompanies the falling water table, followed by a steep curve again. The curve generated during the 0.5 gpm test appears to stabilize at approximately 5.3 feet of drawdown, or 21 feet bTOC, for 2.5 hours. The water levels in the two observation wells had also stabilized during this time, suggesting equilibrium conditions, or steady-state flow. Assuming that steady-state conditions were attained, the Thiem equation can be applied to calculate a rough value for the hydraulic conductivity (K) of the surrounding formation:

$$K = \frac{Q}{\pi(b_2^2 - b_1^2)} \ln\left(\frac{r_2}{r_1}\right)$$

where K = hydraulic conductivity, Q = pump rate, b_1 and b_2 = groundwater elevations at the two observation wells, and r_1 and r_2 = the radial distances of the two observation wells from the pumping well

Inputting all parameters results in a calculated hydraulic conductivity (value for K) of 2.2 feet/day, which is consistent with a fine sand. Again assuming steady-state conditions and no growth with extended periods of pumping, a distance-drawdown plot can be generated to roughly estimate the radius of the cone of depression, as shown in Figure 4. A sustained pumping rate of 0.5 gpm generated a drawdown of approximately 5.5 feet, or 21.5 feet bTOC. Based on Figure 2, a pumping rate of 0.75 gpm would result in a drawdown of over 13 feet, or over 28 feet bTOC.

CONCLUSIONS

The proposed Site development includes two levels of underground parking that would extend to a depth of about 20 feet, and therefore may require dewatering during construction. Three monitoring wells were installed at the Site to a depth of up to approximately 30 feet bgs and an aquifer pump test was conducted to obtain additional information regarding potential dewatering. The following results were obtained:

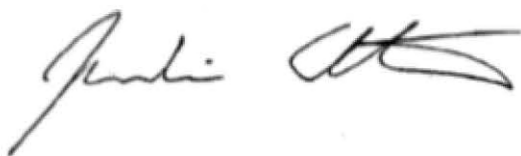
- Depth to groundwater was measured at approximately 16-feet bTOC as shown on Table 1 at time 0 under unconfined conditions.
- The hydraulic conductivity of the formation directly surrounding the pumping and observation wells was calculated as 2.2-feet/day.
- At a pumping rate of 0.5 gpm, a stable drawdown of approximately 5.3-feet (approximately 21-feet bTOC) was documented, and the radius of influence of the resulting cone of depression was estimated at 24-feet during the testing.

The calculated hydraulic conductivity and radius of influence for a discharge rate of 0.5 gpm (with a drawdown of approximately 21-feet bTOC) is a rough estimate for the Site based on the preliminary hydrogeological investigation. Hydraulic conductivity and pumping radius of influence at the Site may vary due to subsurface heterogeneity, variability in flow, preferential flowpaths in the interlayered sediments, unknown boundary conditions, and pumping duration. Based on the data generated during this pump test, the discharge rate of 0.5 gpm is not anticipated to draw water down across substantial distances during temporary dewatering. Due to the distance to water supply wells, it is not anticipated that dewatering would have any drawdown influence on the production rate of the nearest wells.

Additional data should be collected at the time of construction and dewatering to adjust extraction rates and the number, geometric arrangement, and depth of extraction points as warranted by Site conditions.

Should you have any questions, feel free to contact the undersigned at (909) 860-7777.

Sincerely,



Joachim Eberharter, PG, CHg
Senior Geologist



Juan A. Guerrero, PG No. 6321
Director, Environmental Programs

Enclosures: Figure 1 – Temporary Groundwater Monitoring Well Locations
Figure 2 – Drawdown and Recovery versus Time at 0.75 GPM
Figure 3 – Drawdown and Recovery versus Time at 0.5 GPM
Figure 4 – Drawdown versus Distance at Steady-State

Table 1 – Aquifer Pumping Test Data

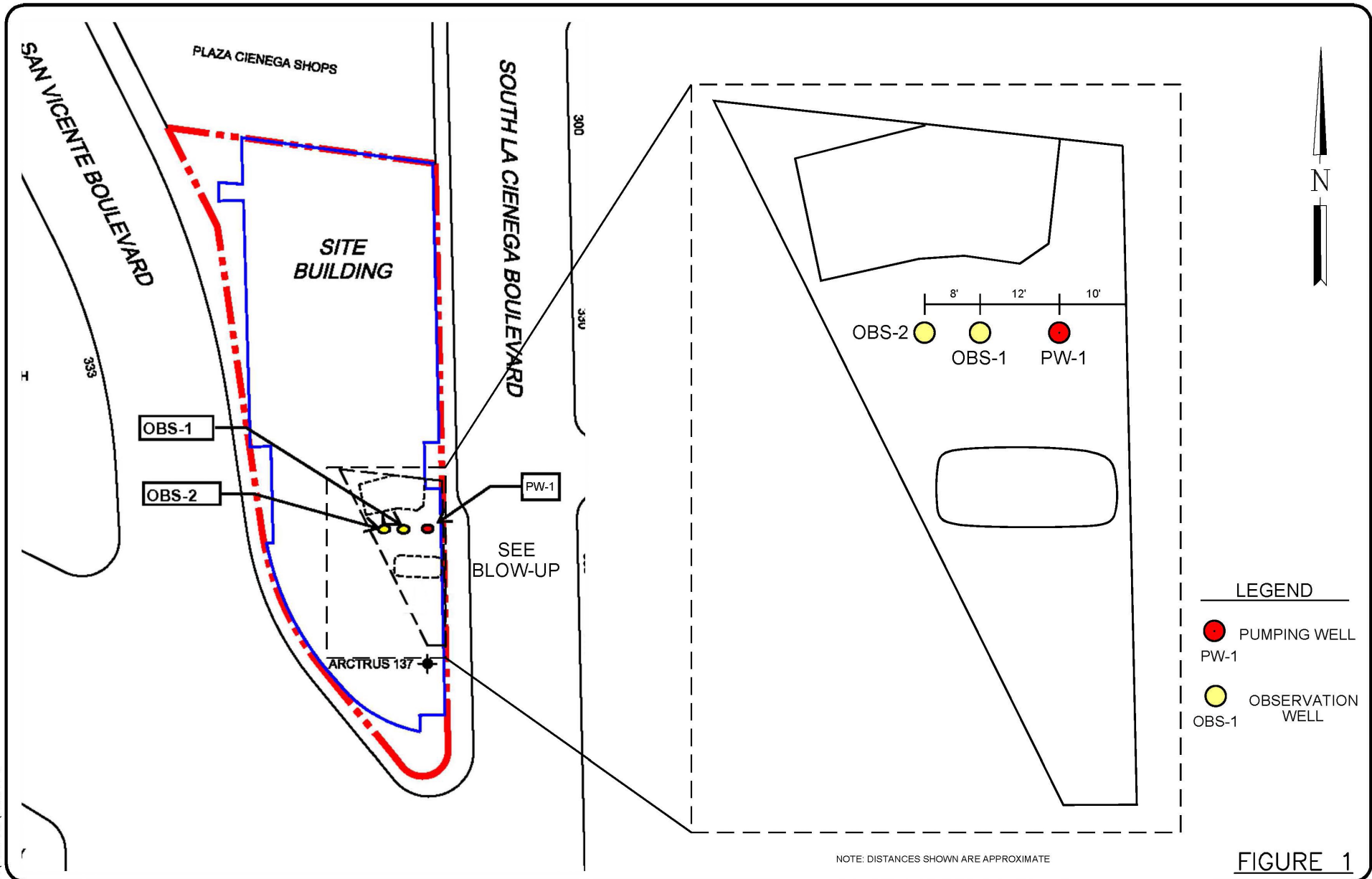


FIGURE 1

J:\CARUSO\333 LA CIENEGA\FIGURES\FIGURE 1

Tt TETRA TECH BAS
 1360 Valley Vista Drive, Diamond Bar, CA 91765
 TEL 909.860.7777 FAX 909.860.8017

333 SOUTH LA CIENEGA, LOS ANGELES	
GROUNDWATER WELL LOCATION MAP	
JOB NO.	2015-0054
DATE	12/2016
DRAWN BY	FCA
FILE NAME:	FIGURE 1

Figure 2. Drawdown and Recovery versus Time at 0.75 GPM

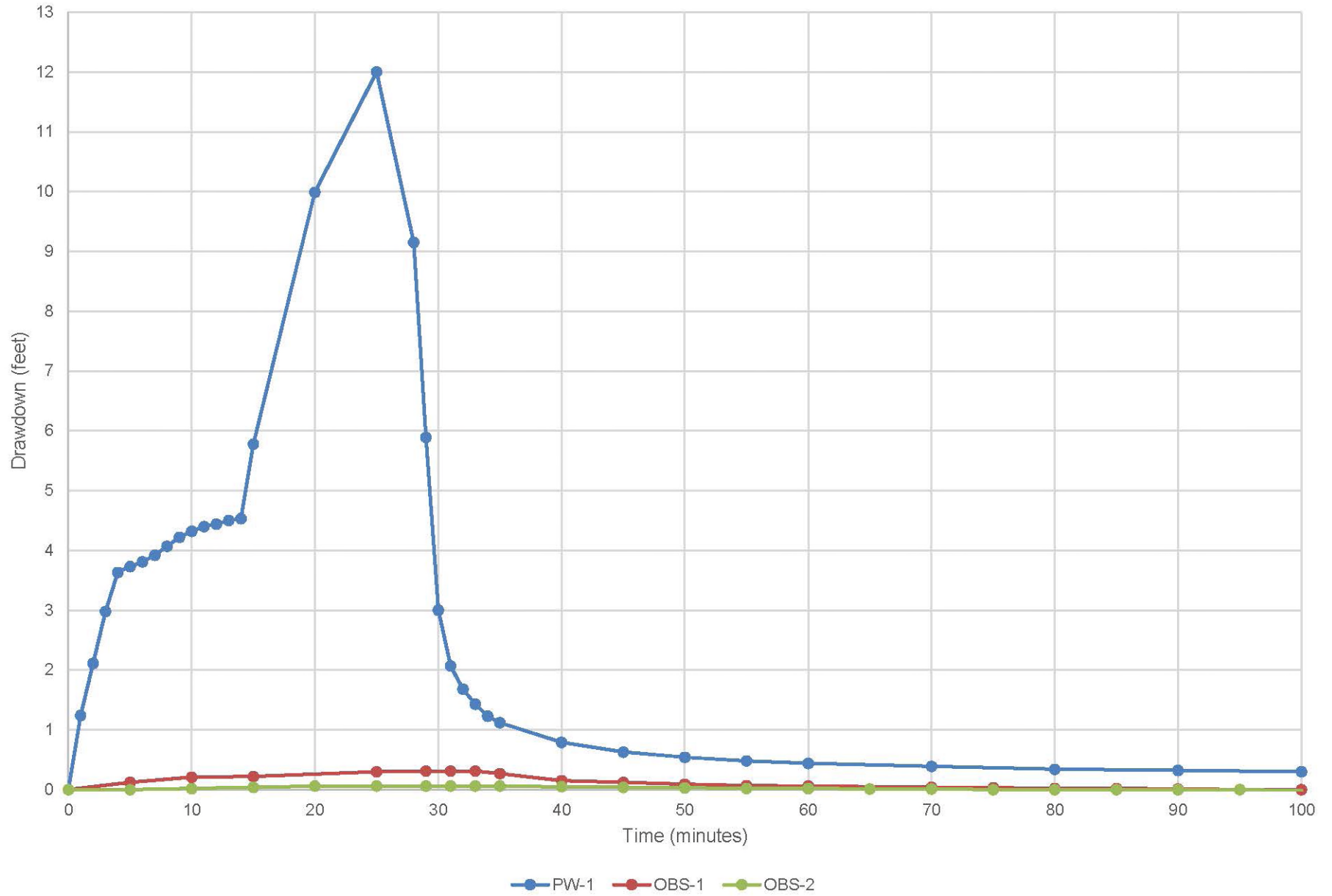


Figure 3. Drawdown and Recovery versus Time at 0.5 GPM

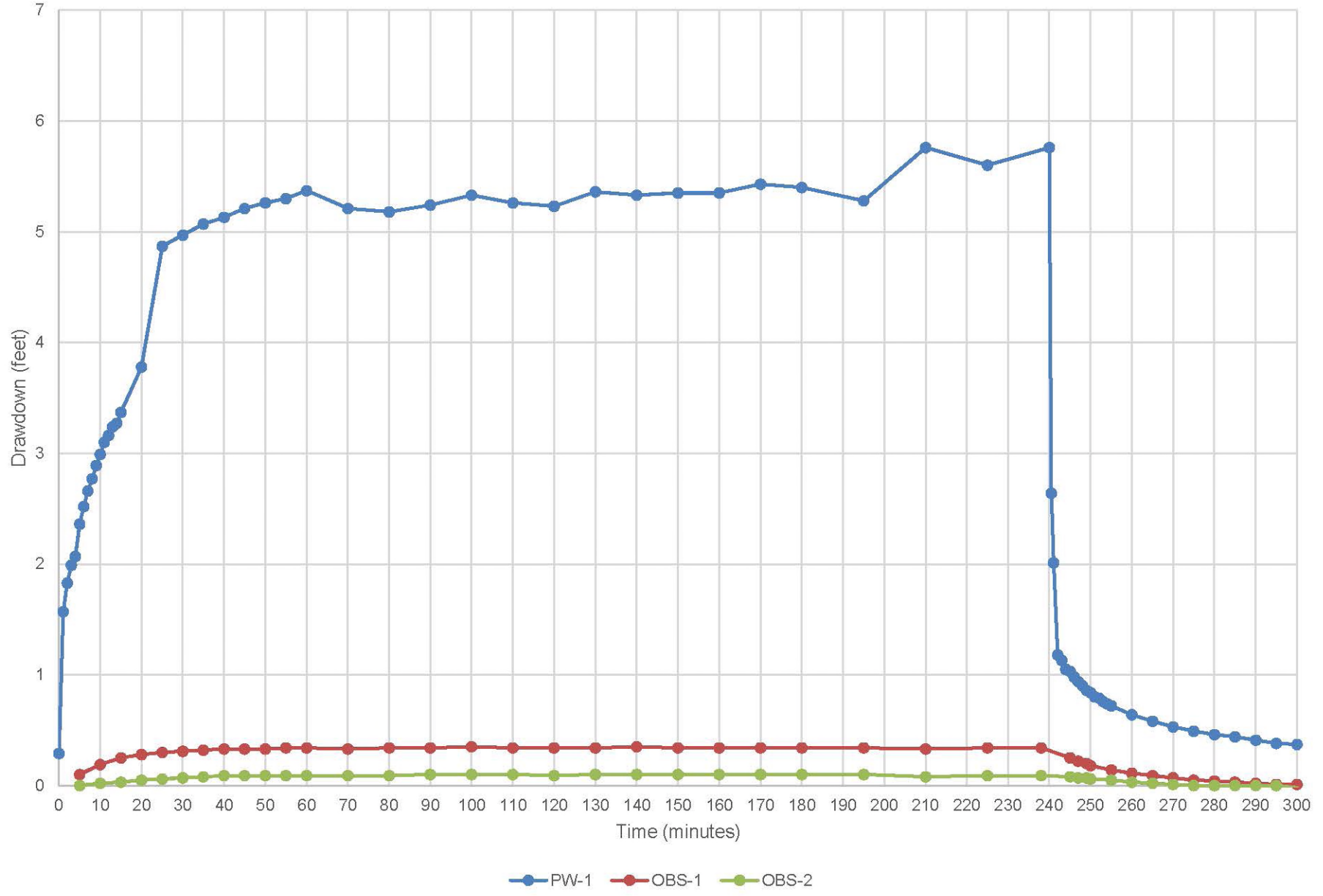


Figure 4. Drawdown versus Distance at Steady-State

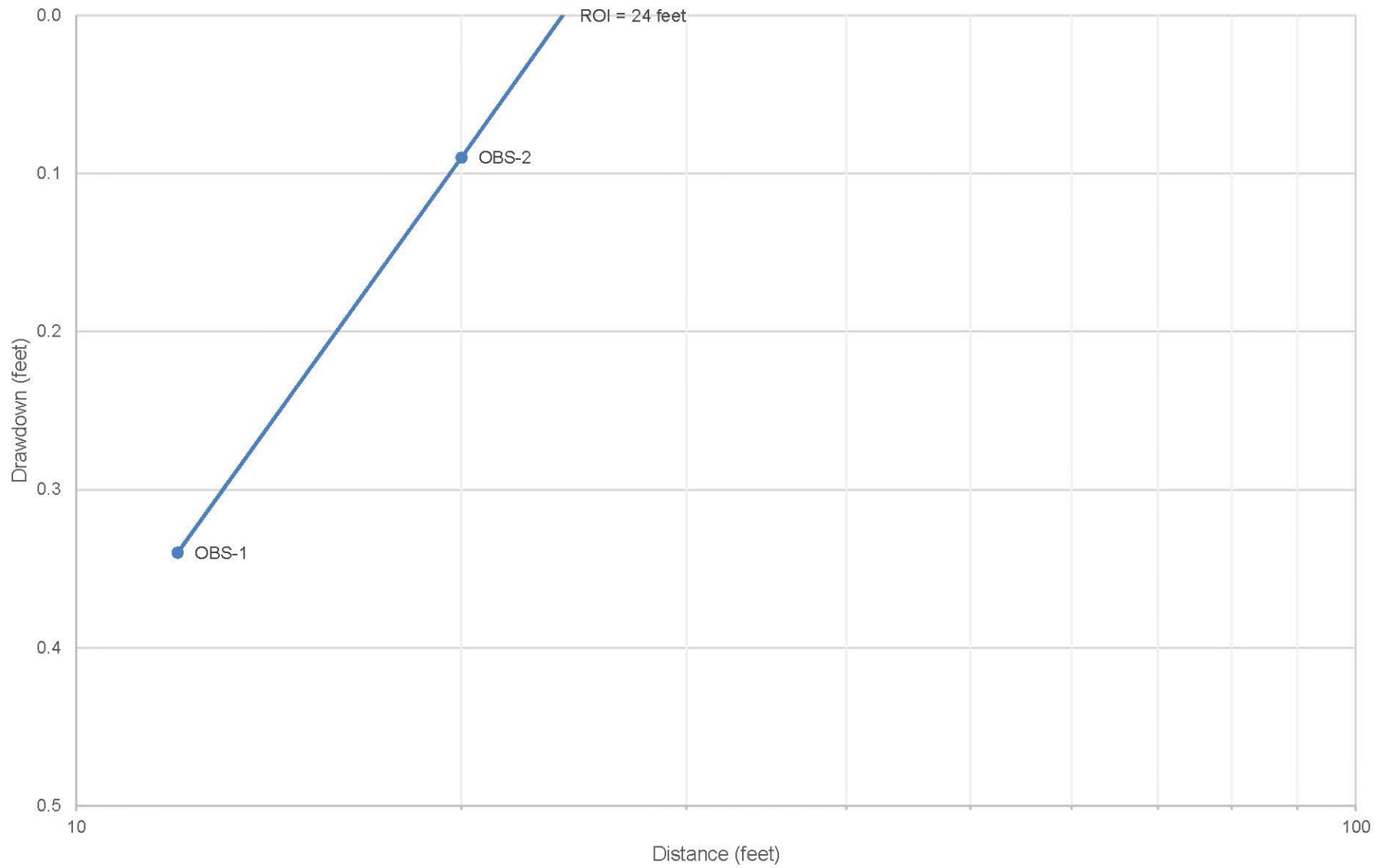


Table 1
Aquifer Pumping Test Data

Time	Minutes	Depth to Water (ft bTOC)			Drawdown (ft bTOC)			Comments
		PW-1	OBS-1	OBS-2	PW-1	OBS-1	OBS-2	
902	7	18.41	—	—	2.66	—	—	
903	8	18.52	—	—	2.77	—	—	
904	9	18.64	—	—	2.89	—	—	
905	10	18.74	16.49	16.31	2.99	0.19	0.02	
906	11	18.85	—	—	3.10	—	—	
907	12	18.91	—	—	3.16	—	—	
908	13	18.99	—	—	3.24	—	—	
909	14	19.02	—	—	3.27	—	—	
910	15	19.12	16.55	16.32	3.37	0.25	0.03	
915	20	19.53	16.58	16.34	3.78	0.28	0.05	
920	25	20.62	16.60	16.35	4.87	0.30	0.06	
925	30	20.72	16.61	16.36	4.97	0.31	0.07	
930	35	20.82	16.62	16.37	5.07	0.32	0.08	
935	40	20.88	16.63	16.38	5.13	0.33	0.09	
940	45	20.96	16.63	16.38	5.21	0.33	0.09	
945	50	21.01	16.63	16.38	5.26	0.33	0.09	
950	55	21.05	16.64	16.38	5.30	0.34	0.09	
955	60	21.12	16.64	16.38	5.37	0.34	0.09	
1005	70	20.96	16.63	16.38	5.21	0.33	0.09	
1015	80	20.93	16.64	16.38	5.18	0.34	0.09	
1025	90	20.99	16.64	16.39	5.24	0.34	0.10	
1035	100	21.08	16.65	16.39	5.33	0.35	0.10	
1045	110	21.01	16.64	16.39	5.26	0.34	0.10	
1055	120	20.98	16.64	16.38	5.23	0.34	0.09	
1105	130	21.11	16.64	16.39	5.36	0.34	0.10	
1115	140	21.08	16.65	16.39	5.33	0.35	0.10	
1125	150	21.10	16.64	16.39	5.35	0.34	0.10	
1135	160	21.10	16.64	16.39	5.35	0.34	0.10	
1145	170	21.18	16.64	16.39	5.43	0.34	0.10	
1155	180	21.15	16.64	16.39	5.40	0.34	0.10	
1210	195	21.03	16.64	16.39	5.28	0.34	0.10	
1225	210	21.51	16.63	16.37	5.76	0.33	0.08	
1240	225	21.35	16.64	16.38	5.60	0.34	0.09	
1253	238	—	16.64	16.38	—	0.34	0.09	
1255	240	21.51	—	—	5.76	—	—	Stop pumping
1255.5	240.5	18.39	—	—	2.64	—	—	Begin Recovery
1256	241	17.76	—	—	2.01	—	—	
1257	242	16.93	—	—	1.18	—	—	
1258	243	16.88	—	—	1.13	—	—	
1259	244	16.80	—	—	1.05	—	—	
1300	245	16.78	16.55	16.37	1.03	0.25	0.08	
1301	246	16.73	—	—	0.98	—	—	
1302	247	16.69	16.52	16.36	0.94	0.22	0.07	
1303	248	16.65	—	—	0.90	—	—	
1304	249	16.61	16.50	16.36	0.86	0.20	0.07	
1305	250	16.59	16.48	16.35	0.84	0.18	0.06	
1306	251	16.55	—	—	0.80	—	—	

**Table 1
Aquifer Pumping Test Data**

Time	Minutes	Depth to Water (ft bTOC)			Drawdown (ft bTOC)			Comments
		PW-1	OBS-1	OBS-2	PW-1	OBS-1	OBS-2	
1307	252	16.54	—	—	0.79	—	—	
1308	253	16.51	—	—	0.76	—	—	
1309	254	16.49	—	—	0.74	—	—	
1310	255	16.47	16.44	16.34	0.72	0.14	0.05	
1315	260	16.39	16.41	16.32	0.64	0.11	0.03	
1320	265	16.33	16.39	16.31	0.58	0.09	0.02	
1325	270	16.28	16.37	16.30	0.53	0.07	0.01	
1330	275	16.24	16.35	16.29	0.49	0.05	0.00	
1335	280	16.21	16.34	16.29	0.46	0.04	0.00	
1340	285	16.19	16.33	16.29	0.44	0.03	0.00	
1345	290	16.16	16.32	16.29	0.41	0.02	0.00	
1350	295	16.13	16.31	16.29	0.38	0.01	0.00	
1355	300	16.12	16.31	16.27	0.37	0.01	-0.02	Final reading

Notes:

* Static depth to water in PW-1 was 15.99 ft bTOC; first reading was shallower due to displacement of water by pump.

— no measurement taken

bTOC below top of well casing

ft feet or foot

gpm gallon(s) per minute

OBS observation well

PW pumping well