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VOLDANS OFFIC

June 4, 2018

BY HAND DELIVERY

Councilmember Jose Huizar, Chair Los Angeles City Council Planning and Land Use Committee 200 North Spring Street Los Angeles, CA 90012

Re: June 5, 2018 Hearing of Case No. CPC-2015-4398-GPA-ZC-HD-ZAD-CU, CEQA No. ENV-2012-1962-EIR (State Clearinghouse No. 2008101017) and appeals related thereto

Chair Huizar and Honorable Councilmembers:

This letter is submitted on behalf of Capri Urban Baldwin, LLC and Capri Urban Crenshaw, LLC (collectively, "Capri") - applicant in Planning Case Nos. CPC-2015-4398-GPA-ZC-HD-ZAD-CU and CPC-2016-3681-DA - in support of its application to undertake redevelopment of the Baldwin Hills Crenshaw Plaza shopping center as a mixed-use transit-oriented master plan development (the "Project"). We respectfully request that you approve the Project with the applicant's requested modifications in our letter dated May 31, 2018, and deny the pending appeals.

On July 13, 2017, the City Planning Commission ("Commission") held a public hearing to consider the Project, including whether the Project had been properly reviewed under the California Environmental Quality Act (Public Resources Code Section 21000 et seq.) ("CEQA"). Following that public hearing, the Commission issued its determination to approve entitlements for the Project, as well as the Baldwin Hills Crenshaw Plaza Master Plan EIR No. ENV-2012-1962-EIR and Errata, SCH No. 2008101017 (the "EIR") as previously certified by the City Advisory Agency.

Several administrative appeals were subsequently filed and will be heard by the Council's Planning and Land Use Management Committee on June 5, 2018 in connection with the above referenced cases. Those appeals were largely the same in form and substance, and in general, the administrative appeals raise issues that were already adequately addressed by the Advisory Agency, Commission and applicant during the underlying approval and environmental review process. However, Capri would like to more fully respond to several of the issues raised in the appeals: Certification of prior CEQA review; greenhouse gas emissions; potential gentrification of the area and displacement of residents; conclusions regarding environmentally superior alternatives; traffic and parking impacts of the Project; public and utility services impacts of the Project; findings of fact made in connection with the [T][Q]C2-2D zoning; consistency of the

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Project with the West Adams – Baldwin Hills – Leimert Community Plan (the "Community Plan"); and community benefits associated with the Development Agreement.

1. The Project EIR Was Properly Certified by the Advisory Agency, and No Further Environmental Review is Necessary

On January 18, 2017, the City Advisory Agency - acting as an official decision-making body for the City - issued a determination approving the Project's Vesting Tentative Tract Map (VTT-73675) and certifying the Final Environmental Impact Report for the Project (EIR No. ENV-2012-1962-EIR and Errata, SCH No. 2008101017). This determination followed a public hearing on December 21, 2016, where the Advisory Agency first considered the Project. There were no administrative appeals filed to the Advisory Agency determination, including certification of the Final EIR. Under CEQA, this process was sufficient to certify the Final EIR for the Project.

CEQA empowers certain nonelected decision-making bodies, such as the City's Advisory Agency, to certify environmental review documents. Public Resources Code section 21151, subdivision (c), provides that nonelected decision-making bodies may certify a final EIR, so long as that certification "may be appealed to the agency's elected decision-making body, if any." (See also CEQA Guidelines, § 15090, subd. (b).) The CEQA Guidelines define a "decisionmaking body" as "any person or group of people within a public agency permitted by law to approve or disapprove the project at issue." (Id., § 15356.) Pursuant to the LAMC, the Advisory Agency is such a "decision-making body" authorized to decide whether to approve the Project or not. (LAMC § 17.03.) Moreover, the LAMC provides an opportunity for any "interested person adversely affected" by an Advisory Agency decision to appeal to City Council. (See id., § 17.06, subd. (A)(4).) Consequently, the Advisory Agency is authorized to certify final CEQA documents, such as the Final EIR for the Project.

One appellant cites *California Clean Energy Committee v. City of San Jose* (2013) 220 Cal.App.4th 1325 [hereafter *CCEC*], for the proposition that the Council must "independently review the EIR prior to approving the Project." (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) Upon review, however, *CCEC* does not support that claim. In that case, the City delegated certification of the final EIR "to a nonelected nondecisionmaking body, the planning commission," which was improper in that case because the planning commission was not authorized to provide final approval of the entitlement at issue in that case. (*CCEC, supra*, 220 Cal.App.4th at p. 1340.) In contrast, the Advisory Agency in our case is a "decision-making body" as defined by the CEQA Guidelines because it has been authorized to approve or disapprove the requested project entitlement (*i.e.*, the tract map). (CEQA Guidelines, § 15356.). The Advisory Agency is therefore empowered to certify final environmental review documents. (See Pub. Resources Code, § 21151, subd. (c).) Pursuant to CEQA and its Guidelines, the Advisory Agency properly certified the Final EIR for the Project.

Because the Final EIR for the Project was properly certified, CEQA does not allow the City to conduct additional environmental review unless "substantial changes are proposed in the

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project," "substantial changes occur with respect to the circumstances under which the project is undertaken," or "new information of substantial importance" requires additional environmental review. (CEQA Guidelines, § 15162, subd. (a).) According to the CEQA Guidelines, "no subsequent EIR shall be prepared" for the Project unless one of those conditions is satisfied "on the basis of substantial evidence." (*Ibid.*) Similarly, the City may not require preparation of a "supplement to an EIR rather than a subsequent EIR" unless "[a]ny of the conditions described in Section 15162 would require the preparation of a subsequent EIR." (*Id.*, § 15163.)

After the Planning Commission reviewed the previously-certified Final EIR for the Project, it determined (as reflected in its determination letter dated August 3, 2017 with respect to Case No. CPC-2015-4398-GPA-ZC-HD-ZAD-CU, also referred to below as the "LOD") that neither subsequent nor supplemental environmental review of the Project was necessary. Appellants have not identified any substantial changes to the Project, its circumstances, or underlying information since that Planning Commission determination. (See CEQA Guidelines, § 15162.) Lacking such evidence, which is necessary to justify preparation of a subsequent or supplemental EIR, the City must rely on the previously-certified Final EIR for the Project.

2. The Final EIR Adequately Analyzes Potential Greenhouse Gas Emissions

Consistent with the CEQA Guidelines, the Final EIR for the Project undertook a qualitative and quantitative analysis of the potential greenhouse gas ("GHG") emissions associated with the Project. As an initial step in this analysis, the Final EIR made a "good-faith effort" to quantify the potential direct and indirect GHG emissions related to construction, transportation, building operations, water use, solid waste treatment, and equipment from landscape maintenance activities. (Project EIR at pp. IV.C-18-IV.C-27; see CEQA Guidelines, § 15064.4 ["Determining the Significance of Impacts from Greenhouse Gas Emissions].) Based on this accounting, the Final EIR determined that the Project would cause a decrease in GHG emissions that represents an approximately 18 percent reduction from the "business as usual" ("BAU") scenario calculated by the California Air Resources Board in 2011 pursuant to AB 32. (Project EIR at Table IV.C-5.) Furthermore, the Final EIR analyzed this accounting to determine that the Project is consistent with regulations, plans, and policies promulgated to reduce GHG emissions by the California Air Resources Board in its Climate Change Scoping Plan, the Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, the Green LA Action Plan, the Sustainable City plan, the Los Angeles Green Building Code, and other similar programs. (Project EIR at pp. IV.C-7-IV.C-14, IV.C-21–IV.C-29.)

One appellant contends the Final EIR for the Project does not adequately analyze potential GHG emissions under CEQA. (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) According to this appellant, a recent decision by the California Supreme Court obligates local agencies to employ a reduction threshold of 30 percent from BAU emissions to meet the statewide goals of AB 32, and, as appellant contends, GHG emissions were not properly analyzed and mitigated under CEQA. (*Ibid.*)

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Contrary to the contention made by this appellant, however, the California Supreme Court has actually approved the flexible, largely qualitative approach permitted by the CEQA Guidelines to analyze GHG emissions consistent with state law. (See *Center for Biological Diversity v. Cal. Dep't of Fish & Wildlife* (2015) 62 Cal.4th 204, 229–230 [hereafter *Newhall*]; see also CEQA Guidelines, § 15064.4.) According to the Supreme Court in *Newhall*, "[t]o the extent a project's design features comply with or exceed the regulations in the Scoping Plan and adopted by the Air Board or other state agencies, a lead agency could appropriately rely on their use as showing compliance" with CEQA. (*Newhall, supra*, 62 Cal.4th at p. 229.) The Final EIR for the Project satisfies this standard established under the CEQA Guidelines and approved by the Supreme Court.

As a first step, the CEQA Guidelines direct that a "lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." (CEQA Guidelines, § 15064.4, subd. (a).) Moreover, the lead agency has discretion to determine whether to use a model or methodology, or instead rely on performance based standards or (as was the case here) "qualitative analysis" of project consistency with applicable local, state, and regional policies to reduce GHG emissions. (Ibid.) When considering the significance of GHG emissions on the environment, lead agencies are obligated to consider the "extent to which the project may increase or reduce [GHG] emissions," as well as "[t]he extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of' GHG emissions. (Id., § 15064.4, subd. (b)(3).)¹ In that way, lead agencies can determine whether the environmental impacts of the GHG emissions from a project are significant or not under CEQA. That qualitative approach has been approved by various courts of appeal in decisions rendered after the Supreme Court decision in Newhall. (See Mission Bay Alliance v. Office of Cmty. Invest. & Infrastructure (2016) 6 Cal.App.5th 160, 198-203 [holding project that complied with qualitative local energy efficiency and conservation standards designed to reduce GHG emissions satisfied CEQA, even without "quantitative" analysis]; Ass'n of Irritated Residents v. Kern Cnty. Bd. Supervisors (2017) 17 Cal.App.5th 708, 741–744 [holding project compliance with statewide cap-and-trade program sufficient to prove "no significant effect on the environment" after "good-faith effort" to estimate GHG emissions]; City of Long Beach v. City of L.A. (2018) 19 Cal.App.5th 465, 491-494 [holding EIR adequate where project was consistent with state and local plans and policies to encourage efficient fossil fuel use, despite quantitative analysis showing net-increase in emissions].)

Such is the case here. The Final EIR for the Project employed the principally qualitative approach spelled out in the CEQA Guidelines and approved by the California Supreme Court in *Newhall*. A good-faith effort was made to account for the potential GHG emissions of the Project, compared to statewide emissions reduction goals, and then determined to comply with or exceed "regulations or requirements adopted to implement a statewide, regional, or local plan for

¹ The CEQA Guidelines also require consideration of whether the emissions from the project "exceed a threshold of significance that the lead agency determines applies to the project," but there has not been a project-level "threshold of significance" adopted by any relevant agency that applies to the Project. (See CEQA Guidelines, §§ 15064.4, subd. (b)(2), 15064.7.)

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the reduction or mitigation of" GHG emissions. (*Id.*, § 15064.4, subds. (a), (b)(3).) CEQA does not demand anything more from the Final EIR.

3. CEQA Does Not Require Review of Strictly Economic and Social Effects, Such as Gentrification and Displacement

A common thread in the administrative appeals is that the Final EIR for the Project did not adequately address potential gentrification allegedly caused by the Project and related displacement of area residents. But that does not mean CEQA is the appropriate tool to analyze potential gentrification and displacement allegedly associated with the Project. CEQA is an environmental statute meant to address environmental impacts. In fact the appellants have not produced evidence that the potential gentrification and displacement allegedly caused by the Project will cause environmental impacts; thus, CEQA is not the legally correct vehicle to address those concerns.

Under CEQA, an EIR is intended to provide "detailed information about the effect which a proposed project is likely to have on the environment." (Pub. Resources Code, § 21061.) An EIR is not meant to be a catch-all planning document that addresses every economic and social change affected by any new development or improvement project. To that end, the CEQA Guidelines dictate that "[e]conomic and social effects of a project shall not be treated as significant effects on the environment." (CEQA Guidelines, § 15131, subd. (a); see also *id.*, § 15064, subd. (e).) Granted, CEQA does allow lead agencies to analyze economic and social effects in an EIR, but only when those social and economic effects will result in significant "physical changes" to the environment. (CEQA Guidelines, § 15131, subd. (a); *id.*, § 15064, subd. (e).) Accordingly, where there is no evidence that alleged economic and social impacts will result in some significant effect on the environment, "CEQA does not apply to such impacts." (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 566.)

Despite the inherent limits of CEQA, appellants have asked this Council to re-open the Final EIR for the Project so that strictly economic and social effects—namely, gentrification and displacement—can be analyzed. According to Appellants, the Project may have negative effects on the "historically Black Crenshaw community . . . particularly renters and seniors on fixed incomes," and asked this Council to set aside the Final EIR for those reasons. (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.)² But issues of "community character" - including "residents' sense of well-being, pleasure, contentment, and values . . . [and] psychological and social factors giving residents a sense of place and identity, what makes them feel good and at home" - go beyond CEQA. (*Preserve Poway, supra*, 245 Cal.App.4th at p. 577.) CEQA case law is clear that the City cannot use CEQA to analyze the

² Similar reasoning was employed in all seven appeals. (See also L.A. Tenants Union, "Justification of Appeal to City Council," Aug. 18, 2017; L.A. Black Worker Ctr., et al., "Justification of Appeal to City Council," Aug. 18, 2017; Jackie Ryan, et al., "Justification of Appeal to City Council," Aug. 18, 2017; Expo Communities Utd., et al., "Justification of Appeal to City Council," Aug. 18, 2017; Black Community Clergy & Labor Alliance, et al., "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Robert Farrell, "Justification of Appeal to City Council," Aug. 18, 2017; Aug. 2017; Aug

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"psychological and social impacts upon its community character as a result of this Project." (*Preserve Poway*, at p. 581.)

The general principle that CEQA does not permit analysis of strictly economic and social effects in environmental review documents substantially limits how those effects can be relevant to environmental review documents. For example, "[w]here a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project." (CEQA Guidelines, § 15064, subd. (e).) But it is incumbent on the party claiming some physical change caused by economic or social effects of a project to produce evidence of that alleged physical change eaused by economic or social effects of a project to produce evidence of that alleged physical change, especially when an EIR has already been certified. (See *Melom v. City of Madera* (2010) 183 Cal.App.4th 41, 54–55 [holding additional CEQA review of "urban decay" effects not required after EIR certified when "[n]o one presented any evidence or argument that approval of the project . . . might result in urban decay"].) In a situation, such as here, where "Appellants present no evidence that any significant physical changes to the environmental will result from" the economic and social effects of the Project as supposed by the appellants, the City "was not required to address the economic impacts of the Project." (*Gray v. Cnty. of Madera* (2008) 167 Cal.App.4th 1099, 1121.)

One appellant does claim the "EIR fails to identify the life-cycle environmental impacts of gentrification that would be triggered by this largely market rate residential Project." (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) While most of the allegedly "environmental impacts" mentioned in that appeal are strictly economic and social effects (such as housing demand, variable rents, and residential displacement) this appellant does allege "air quality and traffic impacts." (*Ibid.*) Notably absent from that appellant's claim, however, is any evidentiary support for that claimed environmental impact. Instead, appellants argue that third party landlords may raise rents in the Crenshaw Corridor as a result of the Project, and individuals who work in the area may be priced out of their residences and be forced to drive farther to their job. But this chain of causation does not have any evidentiary support, and would seemingly apply to any improvement project undertaken by the City or with its approval.

The City is not authorized to re-open the Final EIR for the Project on the basis of such speculative impacts. According to the CEQA Guidelines, an "indirect physical change" caused by economic and social effects may "be considered only if that change is a reasonably foreseeable impact which may be caused by the project." (CEQA Guidelines, § 15064, subd. (d)(3).) When an indirect physical change "is speculative or unlikely to occur," that change is not "reasonably foreseeable" and may not intrude on the analysis otherwise required for an EIR. (*Ibid.*; see also *id.*, § 15145 [directing lead agency to "terminate discussion" of speculative impacts "after thorough investigation"].)

Such is the case here, where appellants have not offered any evidence that the Project will result in physical changes to air quality due to increased or displaced traffic. The rule prohibiting speculative analysis "rests on both economic and practical considerations . . . premature attempts to evaluate effects that are uncertain to occur or whose severity cannot be reliably measured is a

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needlessly wasteful drain on the public fisc." (*Citizens for a Sustainable Treasure Island v. City and Cnty. of S.F.* (2014) 227 Cal.App.4th 1036, 1061 [holding additional CEQA review not required based upon speculative concern that project would be redesigned].) If the City were required to analyze claimed environmental impacts of this Project allegedly caused by displacement of residents by third party property owners, it would likely need to undertake similar analysis of every improvement project it approves. Absent evidence that rises above mere speculation, CEQA does not permit the City to undertake such an expensive and time-consuming endeavor for approvals of specific development projects.

In contrast with the speculative complaints set forth in the appeals, the introduction of the Community Plan, states plainly that the area is: "a desirable location to reside, as clearly evidenced by the enduring stability of its residential neighborhoods. Yet the Community Plan Area's commercial corridors continue to languish through the absence of adequate amenities that support a healthy quality of life. In this regard, the West Adams - Baldwin Hills - Leimert Community Plan Area, which shares its eastern boundary with the South Los Angeles Community Plan Area and includes portions of the City historically known as South Central, continues to reflect the region's varied socio-economic strata but is widely recognized as a place where the enduring racial, ethnic and cultural inclusivity of South LA exists within a setting of economic prosperity." One need only look to the Community Plan's Regional Center section (See West Adams – Baldwin Hills – Leimert Community Plan, pages 3-75 - 3-84) to see how the Project fulfills the goals and policies of the plan, and cultivates the healthy quality of life the plan notes has been elusive in the plan area, while also supporting the diverse and stable residential communities that surround the Project.

In addition, Kosmont Companies, a nationally recognized real estate, financial advisory and economic development consulting services firm has provided data regarding the 18 U.S. Census Tracts that surround the Project site. The data, attached as Exhibit A, relates to housing occupancy characteristics, household income, housing tenure and education levels within the area. Kosmont Companies summarized the data regarding median household income in six neighborhoods surrounding the Project and found that median household income ranged from \$36,746 to \$102,282, with a median income of approximately \$73,000, as compared to a city-wide median income of \$53,000. Overall, the data shows a diversity of income and education, stable housing tenure, and robust levels of homeownership which speak to the mature and stable population of the area. The Project, which proposes mixed-rate housing, and a mix of residential and commercial uses, reflects and is harmonious with this diversity and the tastes of the surrounding areas as they exist today.

Further, the notion that the Project would cause displacement defies logic. The Project will not result in the demolition, removal or redevelopment of any existing housing units. To the contrary, the Project will introduce residential uses to the Project site. The Project proposes to build 961 mixed-rate multi-family dwelling units primarily within areas of the shopping center currently used for automobile parking, expanding the nature and extent of uses on the site and the variety of new housing available to current residents of the Local Study Area and their relations.

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Rental rates and housing values are influenced by a complex array of factors of which housing supply is but one factor and most of these factors are independent of development of the Project. While the effect of rental rates and housing values on housing affordability is an issue throughout Los Angeles, no direct cause and effect can be drawn between the development of the Project and negative changes to the housing market. In fact, it is widely held that increasing the supply of housing alleviates pressure that causes housing prices to rise.

In addition, prior analyses conducted by the City of Los Angeles prepared in connection with the South Los Angeles Community Plan, Southeast Los Angeles Community Plan, and the West Adams - Baldwin Hills - Leimert Community Plan have concluded development in keeping with those plans will not displace housing. As expressly concluded in its Response to Comments to the environmental impact report prepared for the West Adams - Baldwin Hills - Leimert Community Plan (described in the excerpt below as the "Proposed Project") the plan would not generate a displacement to housing impact:

The Proposed Project does not include any physical changes. As discussed below, the removal, demolition, or conversion of existing housing would not foreseeably occur as a direct or indirect result of the Proposed Project. Referring to the Project Description, Section 3.4 of the Draft EIR, the Proposed Project would increase the housing capacity of the CPA through a series of land use changes within Active Change areas. These Active Change areas would accommodate growth within highly urbanized areas that serve a broad cross-section of the community. The proposed changes anticipate projected growth and market demand for housing and jobs in commercial and industrial areas that, although are well served by transit, currently do not accommodate residential uses. The proposed land use changes would allow future uses similar to those already found in the area but with increased heights and intensities. Through these proposed changes, the Proposed Project aims to add, not replace, housing stock while maintaining capacity for jobs in the same area. No specific residential units are proposed to be demolished, converted to market rate, or removed through other means as part of the Proposed Project. The Proposed Project may cause a temporary reduction in housing stock as new buildings are built in place of older ones or as existing buildings are renovated. Ultimately, these land use changes would allow for an overall increase of 17,842 housing units compared to existing conditions. Within the CPIO District, areas currently designated and zoned for residential land uses would remain designated and zoned to allow for residential land uses; however, in some cases, permitted residential densities would be increased. For example, in the La Brea/Farmdale Expo Line Station Area, the majority of the multi-family residential properties are not proposed for any land use and zoning changes. This area was not recommended for land use and zoning changes in order to maintain established neighborhood character and avoid displacement of a concentration of rental housing units, many of which, due to the age of the buildings, have rent

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> levels protected by the Rent Stabilization Ordinance (RSO). The RSO generally applies to multi-family properties constructed prior to 1978. Over 85 percent of the existing multi-family built parcels in the Project Area constructed prior to 1978 are not included in the areas of proposed change. Within the "Active Change" areas of the CPIO District and amended Crenshaw Corridor Specific Plan, for the most part, the proposed land use changes would allow for mixed-use residential development along underutilized commercial and light industrial corridors where housing currently does not exist. Accordingly, adoption of the Proposed Project would not result in the net loss or displacement of housing. Rather the Proposed Project would create capacity to accommodate more housing units than currently exist, creating opportunities for additional housing of all types to be constructed in the CPA. Therefore, the Draft EIR determined that impacts related to the displacement of housing or persons would be less than significant.

The Kosmont Companies also prepared a study in connection with the Project that was submitted to the City Planning Commission, and describes the risk associated with a failure to construct the Project in light of larger retail trends that have led to closures of major retailers and retail centers. As noted in that study, which is enclosed as Exhibit B to this letter, an estimated 20 to 25 percent of U.S. shopping malls will close by 2022 and an estimated 8,640 U.S. retail stores closed in 2017 alone. In addition to creating new housing and new employment, the Project will serve to prevent future degradation of the Project site and surrounding area by diversifying the array of uses located on the Project site, thus avoiding a potential blight condition and the environmental impacts associated therewith.

Finally, the appeals express various secondary effects of gentrification/displacement upon black cultural identity and health and wellbeing that are likewise misplaced. Capri is responding to a demand for new housing to accommodate current community members, including those who are aging and wish to downsize their residences while remaining in the community, so that they can maintain their existing social and economic connections to the area, and younger individuals and families raised in the community but who have been unable to find housing to meets their needs and preferences. Capri also has presented testimony before the City Planning Commission regarding the cultural programming it underwrites at the shopping center, including the annual Pan African Film Festival and Taste of Soul events, as well as monthly free concerts and fitness programs targeted to area seniors that meet three times each week and a kids club that offers arts enrichment to area children. By creating new multi-family housing options and pairing those with expanded retail, food and entertainment uses as well as a new hotel and new office building the Project supports, rather than detracts, from the cultural identity of the community by expanding the presence of a daytime and evening consumer for local businesses and events.

As with the other claims contained in the appeals, any such secondary effects that have been suggested should be considered speculative in nature. No evidence has been submitted to the City record nor was evidence discovered in connection with this study to suggest that any such secondary effects would actually occur.

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4. The City properly deemed Alternative 4 would infeasible and less desirable than the Project

Consistent with CEQA Guidelines, § 15126.6, the Draft EIR articulated five alternatives to the Project and assessed each with respect to potential environmental impacts and the achievement of the Project objectives set forth in the EIR. The LOD describes the analysis and conclusion that none of the alternatives would be superior to the Project as each was deemed infeasible and less desirable than the Project. The LOD further concludes that none of the alternatives reduces significant impacts of the Project to a level of insignificance. (see LOD Pages F-130 - F-142)

One appellant suggests Alternative 4 should have been adopted as an environmentally superior alternative "which would eliminate the CO impacts during Project operations." Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) However the analysis of air quality associated with Alternative 4 concludes that operational emissions under Alternative 4 "would remain significant for VOC and NO_X, as is the case with the Proposed Project." (Draft EIR page V.-80) The LOD acknowledges within its Findings that Alternative 4 did not reduce regional operations emissions to a less than significant level, and generally would result in significant impacts for the same issues as the Project while generating greater impacts with respect to land use, employment-related population growth and housing.

The appeal fails to acknowledge the above, and also fails to acknowledge that Alternative 4 would not achieve all of the Project objectives. Further, the Advisory Agency rejected Alternative 4 and adopted the EIR and a statement of overriding consideration. The appellant(s) did not appeal the Advisory Agency's CEQA determination, nor have they provided evidence to the Planning Commission or in their appeal to justify a subsequent EIR or addendum to the EIR.

5. The EIR and Findings demonstrate sufficient parking and support parkingrelated entitlements

Several claims are made by one appellant with respect to the sufficiency of Project parking as addressed within the EIR and the Project's parking-related entitlements and referenced or similarly raised in the other appeals. However, Project-related parking was analyzed at great length in Chapter 8 of the Transportation Study prepared by Gibson Transportation Consulting, Inc. (Draft EIR, Appendix H - Transportation Study for the Baldwin Hills Crenshaw Plaza Shopping Center) and in the Transportation section of the Draft EIR. That Transportation Study assessed parking demand pursuant to the LAMC and based upon a shared parking demand model based upon guidance published in *Shared Parking, 2nd Edition* (Urban Land Institute and International Council of Shopping Centers, 2005). Shared parking is a well-established practice where two or more land uses share a site, creating variations in the day and time of peak parking demand, and attracting a single user to visit more than one destination during a single auto trip.

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The appellants generally fail to acknowledge that the Project would exceed LAMC parking requirements with 6,829 parking spaces - 2,000 spaces for residential uses and 4,829 spaces for commercial uses. Although the Commission approved parking reduction of up to 10% applicable to commercial parking in selected portions of the site within 1,500 feet of the future transit station, the Project as a whole does not propose to provide parking lower than LAMC requirements. With 4,829 commercial parking spaces, the Project will exceed LAMC requirements, with or without the 10% reduction. This is among the aspects of the Project and recent Commission approvals that the appellants appear to have misunderstood or misconstrued.

As noted above, Gibson Transportation prepared a detailed demand analysis for the Project consistent with the existing and future use of the site as a shopping center supported with shared parking areas. The demand analysis determined that the Project provides sufficient parking during all periods except during the month of December, which is the peak holiday shopping season, when the commercial parking demand would exceed the 4,829 parking spaces to be provided for commercial uses. To address the shortfall associated with parking demand during this one month period (5,551 parking spaces on weekdays and 5,677 on weekends) the EIR sets forth Mitigation Measure L-7. While the appellants call the measure "vague and poorly developed," the measure is clear and well-articulated with a menu of parking management options that would modify employee and patron parking operations through ridesharing, attendant or valet parking, and use of off-site parking as follows:

The program will include one or more of the following mitigation measures as necessary:

• Identification of one or more areas of on-site parking where tandem parking will be operated on a temporary basis with attendant parking for employees.

• Operation of valet parking for customers with tandem parking in certain areas.

• Use of off-site parking for employees with a shuttle van to and from the Project Site.

• A program to encourage employees to rideshare and/or use transit during the holiday shopping season in late November and all of December. (page IV.L-92)

In contrast with this specific menu of operational measures, appellants have provided only a characterization of the parking demand analysis and Mitigation Measure L-7 (Crenshaw Subway Coalition, et al.) or suggested overflow parking in the community would result from the Project's commercial parking and concluded other economic and safety issues would flow therefrom. There is no evidence contained within the appeals to support suggestions contained therein that the Project will result in adverse parking effects or be in any way detrimental to the communities surrounding the Project. In fact, Mitigation Measure L-7 incorporates an approach used at numerous shopping center locations in the City and beyond during the holiday season.

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6. The traffic related impacts of the Project were thoroughly and adequately addressed in the EIR

As noted above, the Transportation Study was completed by Gibson Transportation Consulting, Inc., and analysis based thereon was included within the EIR (Draft EIR Chapter V.L. - Transportation and Circulation and Appendix H - Transportation Study for the Baldwin Hills Crenshaw Plaza Shopping Center). Both were completed consistent with CEQA and the standards and methods of the Los Angeles Department of Transportation ("LADOT") for analyzing project impacts. Mitigation measures included within the EIR were developed in accordance with LADOT's prioritization system and pursuant to LADOT's Transportation Impact Study Guidelines.

One appellant contends the Transportation Study "fails to include major nearby projects" and refers specifically to one project at the intersection of Jefferson and La Cienega Boulevards. This is presumably a reference to the sufficiency of the cumulative impacts analysis of the EIR. However, CEQA Guidelines, § 15125(a) makes clear that an EIR must include a description of the physical environmental conditions in the vicinity of the project as they exist at the time the notice of preparation ("NOP") is published, which will "normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." With regard to traffic impacts, existing conditions includes a list of related future projects to be incorporated into forecasts of project-related impacts. The Project NOP was filed October 2008. In consultation with LADOT the analysis was revised to incorporate data from 2011. The 2011 conditions include assumed related projects drawn from LADOT's database for purposes of forecasting project impacts within a larger context of future development. As is often the case, the related projects included within the Transportation Study included several projects that were reduced in scale or were not pursued as a result of changing economic or other conditions. By the same token, some projects were proposed following the completion of the related projects list. This is to be expected in connection with any related projects list in the City of Los Angeles, or elsewhere. The referenced project was not inappropriately excluded. Rather the Notice of Preparation for the referenced project (CPC-2015-2593-GPA-ZC-HD-ZAA-SPR and ENV-2014-4755-EIR) was not issued until 2015.

Further, the Transportation Study included an annual growth factor for traffic forecasting that more than adequately considered potential future projects not included within the related projects list. The overall growth assumed in the Transportation Study incorporated the related projects *and* this annual ambient growth rate. In fact, the annual growth assumption used by Gibson Transportation substantially exceeds the forecasts in the 2010 Congestion Management Program (Los Angeles County, 2010), which estimates total traffic growth between year 2010 and year 2020 at 1.4% for the West/Central Los Angeles area that includes the Project site. The Transportation Study's ambient growth assumption is more than three times higher, making its assumptions regarding overall growth very conservative in nature. While the appellant has provided no evidentiary support for the claim the Transportation Study was flawed by virtue of its related projects list, the evidence demonstrates that the growth forecasts included within the Transportation Study exceed regional forecasts and present a conservative assessment of the Project's traffic-related impacts.

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One appellant has also suggested two traffic-related mitigation measures improperly defer mitigation - purchase of one new bus for Metro route 210 (Mitigation Measure L-1) and the Neighborhood Traffic Management Plan (Mitigation Measure L-9). (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) As elsewhere, the appellant has provided no evidentiary support for claims regarding the supposed deficiency of those mitigation measures, which were developed in accordance with LADOT's prioritization system and pursuant to LADOT's Transportation Impact Study Guidelines.

With regard to Mitigation Measure L-1, the appellant describes it as insufficiently specific. For reference, the following is the measure in full:

The Proposed Project shall purchase one new bus for Metro route 210. This bus shall have a minimum seated capacity of 40 people and a standing capacity of 50 people. The Proposed Project shall also pay for total operations and maintenance costs for the new bus during weekday peak hours (7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M.) and during Saturday midday peak hours (12:00 P.M. to 2:00 P.M.) for the first three years. To ensure continued operations, the Proposed Project shall pay for the unsubsidized portion of these costs for an additional seven years. Farebox revenues and State/federal transit subsidies shall be credited against O&M costs for years one through ten. The buses may be deployed to another route or location within the Study Area if determined by Metro to serve a greater need.

The Study Area referenced is bounded generally by Washington Boulevard to the north, Normandie Avenue to the east, Florence Avenue to the south, and La Cienega Boulevard to the west. As with the Mitigation Measure L-1 as a whole, it is specific and clear and consistent with LADOT guidelines and practice. The Mitigation Measure also reflects the changing nature of transit infrastructure near the Project site, which will be served by the Metro LAX/Crenshaw light rail line with a station located at Martin Luther King Jr. Blvd.

With regard to Mitigation Measure L-9, the Transportation Study and EIR provided a detailed analysis of potential cut-through traffic impacts according to an established three-step LADOT framework. That analysis resulted in the formulation of a Neighborhood Traffic Intrusion Plan designed to address impacts which may be present in six neighborhoods identified as having the potential to experience cut through traffic after the Project is constructed. The mitigation measure is a reflection of the LADOT process for addressing potentially significant impacts from neighborhood cut-through traffic, which includes iteration with the community to allow the community to participate in the decision whether to implement traffic calming measures should an impact materialize, as the measures themselves are sometimes considered undesirable by the community. (Draft EIR Page IV.L-72.) The appeal fails to acknowledge that the neighborhood intrusion impacts of the Project were considered significant and unmitigated, even with adoption of Mitigation Measure L-9. As stated in the EIR:

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> Due to the uncertainties surrounding the potential significantly impacted areas, including the uncertainty over whether any such impact will even occur, in an abundance of caution, for purposes of this analysis, the potential neighborhood intrusion impact is considered significant, and a Neighborhood Traffic Management Plan process by which the intrusion impact can be identified and mitigated if in the future any of the identified potentially impacted communities determines that it wants the measures to be implemented has been incorporated into the mitigation for neighborhood intrusion impacts. However, because it is possible that a significant impact may occur and that one or more neighborhoods might determine that it does not want to implement the mitigation actions, it is not possible to determine now whether such a potential neighborhood intrusion impact would be fully mitigated were it to occur. Accordingly, it is conservatively concluded that with the identified mitigation, the potentially significant impact will not be fully mitigated. As a further step, this impact is treated as significant even after the implementation of all feasible mitigation measures. (Draft EIR Page IV.L-103)

In sum, with regard to traffic impacts of the Project, all such impacts were sufficiently identified and all feasible mitigation measures have been identified to reduce those impacts.

7. The public and utility services impacts of the Project were thoroughly and adequately addressed in the EIR

One appeal contains commentary regarding fire/emergency response and sewer services impacts of the Project. (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) Notwithstanding the suggestions contained therein, the public and utility services impacts of the Project were thoroughly and accurately assessed within the EIR and no evidence has been presented within the appeals that would suggest the analysis or the conclusion reached therein are insufficient or in error.

Fire/Emergency Response

As noted in the Draft EIR (IV.K.1-2), fire protection and emergency medical services to the Project site are provided by the Los Angeles Fire Department ("LAFD") as mandated by Article 10, Section 130 of the City of Los Angeles Charter and Section 22.70 of the Los Angeles Administrative Code. According to the *L.A. CEQA Thresholds Guide* (2006): "The LAFD evaluates new project impacts on a project-by-project basis. Beyond the standards in the Los Angeles Fire Code, consideration is given to project size and components, required fire-flow, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials." (*see* Section K.2.1.B) The *L.A. CEQA Thresholds Guide* goes on to express the following significance threshold: "A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service." (*see* Section K.2.2.A) And specific to emergency services, the *L.A. CEQA Thresholds Guide* Thresholds Guide requires the following methodology for assessing project impacts: "Consult with LAFD's

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Construction Services Unit to determine the projects effect on fire protection and emergency medical services. Specifically evaluate the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand." (*see* Section K.2.2.B)

The Project was reviewed by LAFD on the required project-by-project basis (*see* Draft EIR, Appendix B, Correspondence from William N. Wells, Captain II, Paramedic Planning Section), in keeping with the methodology described above. That review informed the analysis in the Draft EIR which, consistent with the direction of the *L.A. CEQA Thresholds Guide* concluded that with compliance with specified regulatory compliance measures "the Proposed Project would have a less than significant impact on fire protection services provided by LAFD" – which are inclusive of emergency medical services.

Wastewater

The impacts of the Project on local sewer and wastewater systems are addressed within the Draft EIR at Wastewater – Utility Service Section IV.M-1. That analysis summarizes the two thresholds of significance as set forth in the *L.A. CEQA Thresholds Guide* as follows:

The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan or its elements.

The Draft EIR assesses the future increased demand for wastewater conveyance and treatment and concludes a net increase of 271,135 gallons per day of wastewater would be generated by the Project. Appellants have provided no evidence to contradict that data or the conclusion contained in the Draft EIR that such volume can be accommodated within existing sewer lines serving the Project site, and can be treated within the capacity of the Hyperion Treatment Plant. Specific to sewer capacity, the Draft EIR acknowledged that information was not available for all sewer lines running adjacent to the Project site. However, of those two lines for which specific capacity information was available, the Draft EIR identified known capacity of 392,780 day in the Marlton and Martin Luther King Jr. lines. As such, the Draft EIR concluded known sewer capacity was sufficient to accommodate the projected net increase, noting that additional capacity may exist within those lines for which data was not then available. The Draft EIR reaches the same conclusion with respect to cumulative impacts associated with growth from related projects, which it approximates to be less than 2 million gallons per day of wastewater – well within the 88 million gallons per day treatment capacity then remaining at the Hyperion Treatment Plant. (Draft EIR Pages IV.M.1-9 – 15)

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8. The Project approvals contain findings of fact to support adoption of the Zone Change and Height District Change

The LOD set forth very clearly the nature and purpose of the Zone Change and Height District Change reflected in the modified Qualified Conditions of Approval, or "Q conditions" recommended therein and the modified Development Limitation "D limitation" recommended therein.

With regard to the Q conditions, one appellant appears to have reached the conclusion that the recommended Q conditions permit parking on site below LAMC requirements. (Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017.) However, the Q conditions as set forth on page Q-2 of the Commission's determination state as follows: "Parking shall be in compliance with the LAMC except as otherwise authorized herein." (Condition 7.)

As the Findings contained in that determination reflect, the Zone Change recommended is: "limited to a small triangular portion, located at the northwest corner of the site" where existing zoning requires parking at a rate of three spaces per 1,000 square feet of commercial use, rather than two spaces per 1,000 square feet as required across the remaining 41.8 acres of the 43-acre Project site. The Findings speak at length to the manner in which the change to the triangular portion to bring the parking requirements associated therewith into harmony with the site as a whole, with C2 zoning applicable to the Project site and with the Regional Center land use designation applicable to the Project site pursuant to the Community Plan. It is also clearly stated that the change to this limited area will not alter the zoning pattern applicable to the Project site today or grant additional development rights (LOD pages F-12 – F-14). As noted in section 5 above, notwithstanding the appellants description thereof, the EIR and Findings demonstrate the Project will meet and exceed LAMC parking requirements.

With regard to the recommended D limitation, the LOD is also specific and clear as to the nature and purpose of that change. As the Findings set forth therein describe, properties designated Regional Center within the City are generally allowed a floor area up to a ratio of 6:1. And pursuant to LAMC Sec. 12.21.1.A.2: "total floor area contained in all the buildings on a lot in Height District No. 2 shall not exceed six times the buildable area of such lot." Although the appellant suggests otherwise, the recommended D limitation would indeed limit development on the Project site. In this case it would limit development to a floor area ratio of 3:1, consistent with the density of surrounding development, and one half of that allowed otherwise for a Regional Center within Height District 2. The limitation would also create consistency with the Community Plan, existing development surrounding the Project site, and the Redevelopment Plan for the Crenshaw Redevelopment Project (adopted 1984, amended 1991) which allows a floor area ratio of 3:1 - or 5,519,653 square feet of building area across the site. The Project at build out would include 3,072,956 square feet - 2,446,697 square feet less than the total floor area permitted consistent with the Community Plan and Redevelopment Plan. As such, the Zone Change to amend the "D" Development Limitation on all parcels within the Proposed Project area will make it consistent with the floor area permitted for the Project Site by the Redevelopment Plan, while remaining well within the 3:1 floor area ratio.

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The same section of that appeal which takes issue with the Commission's carefully articulated Findings regarding the D limitation appears to confuse the D limitation with Capri's request for a Conditional Use permit to allow floor area averaging. As noted in the LOD, that application for Conditional Use was dismissed without prejudice by the Commission. That determination was appealable by Capri. However, Capri did not file an appeal of that determination.

9. The Project conforms to the West Adams – Baldwin Hills – Leimert Community Plan

Several appeals contain a broad statement to the effect that "The Project does not Conform with the Intent of the City's General Plan and the West Adams – Baldwin Hills – Leimert Community Plan." (Quoting Crenshaw Subway Coalition, et al., "Justification of Appeal to City Council," Aug. 18, 2017, see also L.A. Tenants Union, "Justification of Appeal to City Council," Aug. 18, 2017 and Expo Communities Utd., et al., "Justification of Appeal to City Council," Aug. 18, 2017.)

None of the appeals provides further context or evidence to suggest a manner in which the Project is inconsistent with the Community Plan, which articulates the policies and standards that implement the City's General Plan in the local area that includes the Project site.

By contrast, the EIR contained a complete analysis of the Project impacts with respect to adopted planning and zoning regulations applicable to the Project site and surrounding areas (IV. Environmental Impact Analysis H. Land Use and Planning, Pages IV.H-1 et seq.) which include the City's General Plan as well as the Community Plan. In addition, the Commission adopted Findings within its LOD that the Project is consistent with the applicable zoning regulations and land use policies of the Community Plan as adopted June 29, 2017 (*see* LOD pages F1 – F12). For example, the Project advances, among other goals and policies, prioritization of mixed use development in transit oriented areas and infill development close to transit, safe pedestrian friendly commercial development, contextual new development that maximizes access to transit, jobs, goods and services, structured off-street parking, expanding opportunities for residential development, advancing residential development at densities that help meet the demand for housing, expanding the diversity of housing types available to the community, creating mixeduse centers that provide jobs, entertainment, culture and serve the region, promoting environmental sustainability, removing barriers and promoting use of underutilized areas.

10. The Project approvals have been adopted consistent with the LAMC and other applicable bodies of law

Several appellants make broad statements to the effect that the Project "violates" several bodies of law, including CEQA, the Community Plan, General Plan and LAMC,³ including its

³ The following appeals contain a statement to the effect that "The Project Violates the City's Zoning and Municipal Codes." (See L.A. Tenants Union, "Justification of Appeal to City Council," Aug. 18, 2017; Jackie Ryan, et al., "Justification of Appeal to City Council," Aug. 18, 2017; and Expo Communities Utd., et al., "Justification of

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Planning and Zoning Code provisions, the California and United States Constitutions and the United Nations' Declaration of Human Rights. However, no additional details or evidence are provided in these appeals.

11. Planning Commission approved a Development Agreement that sets forth robust community benefits

As noted at the outset of this letter, Planning Case No. CPC-2015-4398-GPA-ZC-HD-ZAD-CU is accompanied by a related case CPC-2016-3681-DA. The Commission issued its determination on both related cases on the same date. The Commission's determination with respect to CPC-2016-3681-DA is final and nonappealable as stated therein.

Notwithstanding same, we note for your consideration that the Development Agreement as recommended by the Commission contains a robust array of community benefits as set forth in Section 2.3.1 thereof, including a 10% set aside for income restricted housing applicable to all apartments and condominiums to be built as part of the Project, as well a 25% local hire goal for construction and operations jobs in connection with the Project, a \$2 million contribution for youth workforce development, a \$1.5 million contribution to support tree trimming services, a \$200,000 contribution to help establish a new Business Improvement District, and additional street and sidewalk improvements. The description of the Development Agreement contents contained in the various appeals is not consistent with the Development Agreement contained within the Commission's determination. It is also worth noting that the appeals make selective use of a single zip code for characterizing the Project's community; however as noted above, median household income in the six neighborhoods surrounding the Project ranges from \$36,746 to \$102,282.

Capri has been a great neighbor, demonstrating a commitment to the community that is unparalleled. Since acquiring the shopping center, Capri has invested more than \$70 million in renovations, rent concessions and community programming to attract and keep both national and local businesses. As described above, the mall hosts a weekly farmers market, multiple weekly fitness classes for seniors, classes for area youth and live concerts at the Project site.

The Baldwin Hills Crenshaw Plaza Master Plan is a great project, and we respectfully request you approve the Project and deny the appeals.

Appeal to City Council," Aug. 18, 2017 Labor Alliance, et al., "Justification of Appeal to City Council," Aug. 18, 2017, Black Community Clergy & Labor Alliance, et al., "Justification of Appeal to City Council," Aug. 18, 2017.)

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In closing, we thank you for your consideration.

Very truly yours,

Jeksper

Lindsey C. Kozberg of PARK & VELAYOS LLP

Enclosure

cc: Councilmember Marqueece Harris-Dawson Council President Herb Wesson Mr. Solomon Rivera Ms. Joanne Kim Mr. Lynell Washington Mr. Deron Williams Mr. Andrew Westall Mr. Jordan Beroukhim Ms. Luci Ibarra Mr. Quintin Primo Ms. Rachel Freeman Marcos Velayos, Esq. EXHIBIT A

Census Tract	HOUSING OCCUPANCY									
	Total Housing Units	Owner-Occupied Housing Units	Renter-Occupied Housing Units	Homeowner Vacancy Rate (%)	Rental Vacancy Rate (%)					
2190.2	1,501	703	666	0.0	3.4					
2193	1,516	309	1,144	0.0	2.0					
2195	783	491	202	0.0	6.0					
2197	1,480	649	746	7.6	1.7					
2200	2,156	710	1,383	0.0	0.0					
2340	2,102	1,302	684	3.3	0.0					
2342	1,169	660	441	0.0	5.6					
2343	2,482	418	1,791	24.8	5.3					
2345.01	976	522	396	0.0	7.7					
2345.02	1,228	376	736	11.7	2.5					
2346	1,761	901	741	0.0	2.9					
2361	3,019	543	2,282	3.7	4.0					
2362.02	2,617	11	2,430	0.0	5.5					
2362.03	1,553	30	1,461	0.0	3.2					
2362.04	1,426	0	1,226		9.4					
2364	2,158	1,013	971	2.1	9.3					
7031	2,573	1,536	893	0.0	0.0					
7032	2,541	1,797	525	0.0	12.1					
TOTAL	33,041	11,971	18,718	terren - themin	the second					
City of Los Angeles	1,436,543	494,682	848,079	1.4	3.8					

Table 1— Housing Occupancy Characteristics – Local Study Area

Source: US Census Bureau (2015); American Fact Finder



The analyses, projections, assumptions, rates of return, and any examples presented herein are far diustrative purposes and are not a guarantee of actual and/or future results. Project pro forma and tax analyses are projections only. Actual results may differ from those expressed in this analysis.

Community	Population	Median Household Income	Average Household Income	Per Capita Income	Unemployment Rate	
Baldwin Hills	29,081	\$32,264	\$48,575	\$19,820	7.30%	
The Village Green	935	\$69,748	\$85,842	\$45,676	1.70%	
Windsor Hills	11,418	\$77,840	\$105,717	\$43,248	5.30%	
Ladera Heights	6,640	\$102,282	\$139,864	\$58,392	5.50%	
Leimert Park	21,268	\$41,989	\$59,172	\$22,161	6.90%	
Park Mesa Heights	35,600	\$36,746	\$53,467	\$18,902	8.20%	
City of Los Angeles	3,986,442	\$53,329	\$85,788	\$30,172	5.00%	

Table 2— Community Information – Surrounding Communities

Source: ESRI Business Analyst Online (2017); CoStar (2017)



The analyses, projections, assumptions rates of return, and any examples presented herein are for diustrative purposes and are not a guarantee of actual and/or future results. Project pro-forma and tax analyses are projections only. Actual results may differ from those expressed in this analysis.

Census Tract		НО	USING TEN	URE		YEAR HOUSEHOLDER MOVED INTO UNIT					
	Occupied housing units	Owner- occupied	Renter- occupied	Average HH size of owner- occupied unit	Average HH size of renter- occupied unit	Moved in 2015 or later	Moved in 2010 to 2014	Moved in 2000 to 2009	Moved in 1990 to 1999	Moved in 1980 to 1989	Moved in 1979 and earlier
2190.2	1,369	703	666	3.52	2.62	9	345	475	251	121	168
2193	1,453	309	1,144	3.13	3.01	0	488	563	244	56	102
2195	693	491	202	2.66	2.08	0	109	159	135	74	216
2197	1,395	649	746	3.47	2.55	9	415	596	206	81	88
2200	2,093	710	1,383	3.19	2.51	0	837	739	355	60	102
2340	1,986	1,302	684	2.78	3.01	0	454	637	291	175	429
2342	1,101	660	441	2.32	1.56	0	175	405	198	121	202
2343	2,209	418	1,791	2.33	1.58	0	869	641	333	162	204
2345.01	918	522	396	3.18	1.66	0	198	329	125	78	188
2345.02	1,112	376	736	2.21	1.88	49	279	332	186	129	137
2346	1,642	901	741	3.16	2.87	0	478	518	290	48	308
2361	2,825	543	2,282	2.39	1.68	0	1,228	1,022	233	170	172
2362.02	2,441	11	2,430	1	2.29	56	1,334	662	277	39	73
2362.03	1,491	30	1,461	1.30	2.53	9	677	576	138	0	91
2362.04	1,226	0	1,226	-	2.39	29	416	473	209	49	50
2364	1,984	1,013	971	2.43	2.00	43	473	683	377	141	267
7031	2,429	1,536	893	2.61	1.67	23	478	929	281	180	538
7032	2,322	1,797	525	2.64	2.49	0	560	637	413	194	518
TOTAL (#)	30,689	11,971	18,718	43	40	227	9,813	10,376	4,542	1,878	3,853
TOTAL (%)	100%	39%	61%	0.1%	0.1%	0.7%	32%	34%	15%	6%	12.5%
City of Los Angeles	1,342,761	494,682	848,079	3.06	2.71	18,799	482,051	451,168	206,785	84,594	99,364

Table 3— Housing Tenure

Source: US Census Bureau (2015); American Fact Finder



The analyses, projections, assumptions, rates of return, and any examples presented herein are for diustrative purposes and are not a guarantee of actual and/or future results. Project pro forma and tax analyses are projections only. Actual results may differ from those expressed in this analysis.

Community	EDUCATIONAL ATTAINMENT											
	Less than 9th Grade	9th - 12th Grade, No Diploma	High School Graduate	GED / Alternative Credential	Some College, No Degree	Associate Degree	Bachelor's Degree	Graduate / Professional Degree	Bachelor Degree or Higher			
Baldwin Hills	9.1%	12.1%	22.6%	2.1%	24.7%	7.0%	14.9%	7.6%	22.5%			
The Village Green	1.6%	8.7%	7.8%	2.9%	29.6%	5.5%	26.0%	17.8%	43.8%			
Windsor Hills	1.6%	2.7%	7.7%	1.2%	25.1%	8.6%	25.2%	27.8%	53.0%			
Ladera Heights	0.8%	1.6%	8.9%	0.9%	26.1%	5.9%	29.5%	26.1%	55.6%			
Leimert Park	14.2%	10.8%	23.5%	2.0%	20.6%	9.2%	10.9%	8.8%	19.7%			
Park Mesa Heights	11.3%	13.0%	21.1%	2.4%	30.2%	7.8%	9.0%	5.2%	14.2%			
City of Los Angeles	14.6%	9.4%	18.2%	1.5%	17.5%	5.7%	21.8%	11.3%	33.1%			

Table 4 — Educational Information

Source: ESRI Business Analyst Online (2017)



The analyses, projections, assumptions rates of return, and any examples presented hereit are for divergive purposes and are not a guarantee of actual and/or future results. Project proforma and tax analyses are projections only. Actual results may differ from those expressed in this analysis EXHIBIT B

Market Fiscal & Economic Benefit Study Baldwin Hills Crenshaw Plaza, Los Angeles, CA



Kosmont Companies June 30, 2017



- Kosmont Companies was retained by Capri Investment Group to complete a Mixed-Use/Retail Market and Fiscal Impact and Economic Benefit Analysis associated with the proposed transformation of the Baldwin Hills Crenshaw Plaza into a Mixed-Use, Transit-Oriented development in the heart of the Crenshaw District.
- The Analysis consists of four (4) major components namely,
 - 1. Retail Trends Overview
 - 2. Project Description
 - 3. Fiscal Impact Analysis
 - 4. Economic Benefit Study

An overview of the Analysis is presented herein.





2

I. Retail Trends



3

The future of retail malls faces many challenges, some of which are simply unavoidable, as the digital economy converts the lifestyles and social patterns of every generation. With today's consumer's using online websites for purchasing clothing, shoes and a broad array of other soft goods, even the most vibrant communities are facing the reduction in retail store format sizes and bankruptcies of dozens of major retail store chains.

Consumers are consuming retail goods and services through multiple vehicles known as Omnichanneling, including e-Commerce and not just storefronts.

Younger consumers (aka Millennials), with their increased use of media and digital communication, are looking for gathering places with restaurants and entertainment venues, rather than collections of retail stores.

According to Credit Suisse, 20% to 25% of the nation's 1,100 shopping malls – or roughly 220 to 275 shopping centers – will close by 2022.



According to Credit Suisse, in 2017, 8,640 retail stores will close in the United States – a far greater number than at the height of the 2008-09 financial crisis.

Unit Closings (Full Year Estimate)



Source: Credit Suisse



5

According to the Wall Street Journal, as of the end of the 1Qtr. 2017, 10 retailers had filed for bankruptcy protection and more filings are expected.



Source: Credit Suisse



In 2017, **49 MILLION** square feet of retail space has gone dark. Should this pace continue, a record-setting **147 MILLION** square feet of retail space is projected to close.







Currently e-commerce represents about 10% of all sales. By 2020, on-line sales are projected to double.





Today's Retail:

- **1**. Big Box Shrinkage
 - Size matters, but bigger is not necessarily better; most stores smaller by 25% to 75%
- 2. Food and Place are New Anchor Tenants
 - For the first time in history, U.S. restaurant sales have surpassed grocery sales
 - You Can't Eat or Drink Over the Internet
- 3. Mixed Use is about the Right Blend
 - Today's "value" metric is more about time and trip generation than sales per square foot
 - Community Retail instead of lifestyle retail
- **4.** Millennials Defining Consumer Demographics
 - Misconception vs. Reality: More spending power than any other generation (\$600B)
 - 80M strong, mobile devices are their medium for communication, research, shopping, etc.
 - Experiential Retailing



- 1. Box retail is shrinking, right-sizing, closing, etc., while discounters enjoy success
- 2. Food and Place are today's anchor tenants
- 3. Community Retail is key ingredient in the blending and mixing of uses
- 4. Millennials drive and thrive on a digital and sharing economy
- 5. Retailers are embracing physical and online platforms to capture larger amounts of sales through Omnichannelling



Residential Community Retail Experiential / Entertainment / Fitness Food / Grocery / Restaurants Medical / Office / Civic

The 3D Effect 1. Demand 2. Design

3. Density



11
Changing demographics combined with the public desire for social interaction and convenience is causing a boom in mixed-use or "blended-use" development. Consumers want to spend time doing things they enjoy rather than shopping for everyday goods.

Retail landlords are increasingly adding office, hotel, residential and open space to their shopping centers to draw in more customers throughout the day and evening hours (i.e., creating villages). Retail shop space is being converted towards dining and entertainment tenants, with some food stores becoming anchors (e.g., "Eataly" – Italian market).

These blended-use projects are also becoming a significant attraction for businesses seeking to attract younger professional workers, who no longer want to be located in a suburban office park or high rise tower. For example at Santana Row shopping center in San Jose, a 240,000 SF speculative office was fully leased and another office building is now in planning.

Source: Shopping Centers Today June 2017 / Western Real Estate Business June 2017



BENEFITS OF TRANSIT ORIENTED DEVELOPMENT

Americans believe transit oriented development provides an array of benefits ranging from lifestyle to environmental to economic.





Many National Developers are repositioning Malls into Villages and Blended-Use Developments

- Westfield Promenade, Woodland Hills
- Laguna Hills Mall
- Scottsdale Fashion Square



From Westfield Promenade to "Promenade 2035," Woodland Hills, CA

Westfield is proposing to demolish the existing Westfield Promenade and reposition the 34-acre site into a mixed/"blended" use project consisting of 244,000 SF of retail, 1,400 dwelling units, 150,000 SF of creative office, 470,000 SF of Class A office, and two hotels providing a total of 572 rooms.

The project includes a 15,000-seat Entertainment and Sports Center and 7 Acres of open space spread across the ground level and rooftop gardens and landscaping atop nearly every building.







Laguna Hills Mall was built in 1973. Over time, only minor upgrades were completed, which contributed to a *tired mall with high vacancy*.



A 926,000 square-foot mixed-use project. Uses include apartments, a pedestrian-friendly promenade, outdoor dining, new department store facades, re-designed mall interior, 14-screen luxury cinema, fitness center, and park with a lake.

SOURCE: http:fivelagunas.com Web. 26 June 2017.

First opened in 1961 as an open-air center that featured Goldwater's Department Store and a handful of specialty shops. Near the end of 2016, Macerich Co. announced a phased project to further enhance their upscale regional luxury shopping mall, in keeping with Scottsdale's planning vision and criteria for the downtown area and high level consumer shifts towards mixed-use/work/play projects that provide one-stop shopping and pedestrian connectivity.



Scottsdale Fashion Square Phased Development

The first phase of the project will update and redefine the luxury wing of the mall, with a new entrance and arrival point, and outward facing retail and restaurants. Construction is planned for completion in the fall of 2018. Macerich Co. also plans to add mixed use elements on a sevenacre parcel immediately north of the mall potentially consisting of high-end residential units, hospitality uses, a class A office building and a high-end organic grocer. The addition of high-end experiential retail components and more diverse land uses in the area will maximize the mall's sales potential, and further extent its customer base.



"This multi-phased project is part of Macerich's longterm strategy, as well as the center's own history, of continually reinvesting in irreplaceable retail destinations,"

- Robert Perlmutter, Macerich CEO



II. Project Description



Senta Monice Fwy W Adams Blv CRENSHAW W Jefferson Blvd **EXPOSITION** STATION position Blv Rodno Rd. Coliseum ! W 39th St **CRENSHAW/MLK** STATION ····· W Martin Luther King J TRANSFORMING Ж **BALDWIN HILLS LEIMERT PARK** CRENSHAW STATION ... N 481h S Legend Future Crenshaw ight Rail Stations W 54th St Crenshaw Light Rail Line W Sinuson Ave **CRENSHAW**/ Streetscape **SLAUSON** Plan Boundaries STATION Streets FLORENCE/ WEST **STATION** W Florence Ave To Los Angeles International Airport

The proposed project is located on a 43 acre, triangularshaped parcel bordered by 39th Street on the north, Crenshaw Boulevard on the east, Stocker Street on the south, and Santa Rosalia and Marlton Avenue on the west.

The Crenshaw/LAX Metro Line (opening in 2019) will have a stop in front of the subject site, which connects to the subject's proposed Plaza.





79th Street



The proposed project will preserve most of the existing improvement area and add approximately of 2.1 million square feet of new development, including 331,838 SF of retail, 143,377 SF of office, a 400-key Hotel, and 961 residential dwelling units. The majority of the dwelling units, 551 units or 57% are estimated to be for-sale/condominium units while the balance, 410 units represent apartment rental units.

Land Use	Existing	Proposed SF	Proposed Room/DU	Net Increase
Mall Building	833,077	833,077	N/A	141
Retail/Restaurant	104,041	435,879	N/A	331,838
Movie Theater	75,000	75,000	N/A	
Office	4,623	148,000	N/A	143,377
Banquet Hotel - 400 Key	-	346,500	N/A	346,500
Residential - Condominiums	8	742,500	551 DU	742,500
Residential - Apartments	2	492,000	410 DU	492,000
Total Project Area (SF)	1,016,741	3,072,956		2,056,215



\$600 MM

Investment (Rounded)





SOURCE: Capri Investment Group

Development Costs Development Cost ~ \$588 Million *Does not include acquisition costs

Construction Jobs (FTE) 3,495 full time equivalent man-years

On-Site Sales Increase \$98 MM in On-Site Taxable Sales/Yr.

Annual City Fiscal Revenues \$8.5 million per year at buildout

Full-Time Employment & Residents 1,760 Jobs Created 2,518 Residents





III. Annual Fiscal Impact



\$8.53 Million <u>+</u> in Annual Gross Fiscal Revenues based on Property Taxes, VLF, Transfer Taxes, On- and Off-Site Sales and Use Taxes, Transient Occupancy Tax, Utility User Tax, Parking Tax, Rental Income, Business & Franchise Taxes.

rimary Fiscal Revenues	Estimated Annual Total
Property Tax (Secured & Unsecured)	\$2,519,000
Property Tax In-Lieu of VLF	\$575,000
Property Transfer Taxes	\$91,300
Sales & Use Tax (On-Site/Direct)	\$1,085,600
Sales & Use Tax (Off-Site/Indirect)	\$150,300
Transient Occupancy Tax	\$2,873,900
Utility User Tax	\$510,600
Parking Tax	\$205,200
Business Taxes	\$452,500
Rental Income Tax	\$36,070
Franchise Taxes	\$32,900
otal General Fund Revenues (ROUNDED):	\$8,532,370

* All estimates are expressed in current 2017 dollars.



The subject property is located in Tax Rate Area (TRA) 00062. The City of Los Angeles receives \$.3271 of each \$1.00 of secured property tax revenue within the TRA, generating \$2.5 million per year at buildout.

		BHCP
Total Development Costs (Rounded)		\$588,200,000
5% Allowance for NQ Soft Costs		(\$29,410,000)
Development Assessed Value:		\$558,790,000
Condominium - Value Add Upon Re-Sale (Ro	ounded):	\$ 141,280,000
Total Assessed Value		\$700,070,000
Property Tax Rates		
General Levy - Secured	1.00%	\$7,000,700
City General Fund Distributions - Secured	32.71%	\$2,289,988
3		
Unsecured Property as Percent of Secured		10.0%
Estimated Unsecured Property Taxes to City		\$228,999
Total Property Tax to City (Secured + Unsecured)	- Rounded:	\$2,519,000



Property Tax-In Lieu of VLF is estimated based on incremental assessed value that the proposed Project will add to the City tax rolls, which will increase the City's apportionment of property tax in-lieu of VLF. The estimated apportionment associated with the project is \$575,000.

	BHCP
Total Estimated Assessed Value	\$700,070,000
Total Assessed Value within City (2015-16)	\$497,896,274,993
Percent Share / Increase in Assessed Value	0.1406%
Estimated Property Tax In-Lieu of VLF	\$408,967,000
Incremental Project Tax In-Lieu of VLF	\$575,000



The Analysis assumes that approximately 75% of gross receipts associated with the new *retail/entertainment/restaurant* component will be taxable. Taxable sales for the **retail component** are therefore estimated at \$300 psf, yielding a total of \$1.1 million in on-site/direct sales & use taxes at buildout.

Sales Generating Components	Average Occ. SF/Units	Gross Receipts PSF	Gross Receipts Total	Non-Taxable Sales	Taxable Sales/Unit	BHCP (Rounded)
Hotel: Food/Beverage/Taxable	300 Rooms	\$75/Room	\$8,212,500	N/A	\$75/Room	\$8,210,000
Retail/Restaurant	298,654	\$400 PSF	\$119,461,680	(\$100 PSF)	\$300 PSF	\$89,596,260
Total Taxable Sales:						\$97,806,260
Annual Sales Tax to City					1.0%	\$978,063
Annual Use Tax as % of Sales Tax					11.0%	\$107,587
Total Sales and Use Tax to City (On-Site / Direc	t)					\$1,085,600

Based on a 25% capture rate for the project's employees and a 30% capture rate for the residents and hotel guests, the project is estimated to generate \$150,300 in annual off-site sales and use taxes.

	BHCP
Retail & Restaurant Employees	
Estimated Annual Taxable Spending / Empl.	\$12,343
Estimated Capture within City (Off-Site) 25%	\$3,085.80
Estimated # Employees	1,10
Total Employee Taxable Spending within City	\$3,410,448
Office Empployees	
Estimated Annual Taxable Spending / Empl.	\$25,30
Estimated Capture within City (Off-Site) 25%	\$6,326.18
Estimated # Employees	54
Total Employee Taxable Spending within City	\$3,422,748
Residents	
Estimated Annual Taxable Spending / Resident	\$21,900
Estimated Capture within City (Off-Site) 30%	\$6,570
Estimated # HH (2.8 Persons/HH)	91:
Total Employee Taxable Spending within City	\$5,998,082
Hotel / Housing Employees	
Estimated Annual Taxable Spending / Empl.	\$12,000
Estimated Capture within City (Off-Site) 25%	\$3,000
Estimated # Employees	11:
Total Employee Taxable Spending within City	\$340,01
Hotel Guests	
Estimated Annual Taxable Spending / Guest	\$13,68
Estimated Capture within City (Off-Site) 30%	\$4,10
Estimated # Guests	45
Total Taxable Sales Captured	\$1,872,45
Total Indirect Taxable Sales	\$15,043,74
Estimated % Capture On-Site	(15%
Less Estimated Capture On-Site	(\$1.504.374
Total Off-Site / Indirect Taxable Sales	\$13,539,36
Annual Sales Tax to City 1.0%	\$135,394
Projected Use Tax as % of Sales Tax 11.0%	\$14,893
	\$150,300



The City of Los Angeles collects a 14% tax on all *transient occupancy* of 30 days or less – "TOT." Based on the market average occupancy rate, the estimated annual TOT to the City of Los Angeles is \$2.87 million.

	BHCP
Number of Rooms	400
Average Daily Room Rate	\$185.00
Average Occupancy Rate	76%
Annual Hotel Room Receipts	\$20,527,600
City TOT Rate	14.0%
Annual TOT to City	\$2,873,900



30

SOURCE: City of Los Angeles, Finance Department & Kosmont Companies

The City of LA imposes a 12.5% Electric, 10.0% Gas, and 9.0% Communications tax on the usage of these utilities. Based on the projected usage for the various land uses, the total utility taxes are \$510,000.

	Restaurant	Office	Hotel	Residential	TOTAL
Est. Occupied Commercial SF	298,654	129,039	N/A	N/A	
# of Occupied DU or Rooms	N/A	N/A	300	914	
Electric					
Estimated Usage/SF	\$2.50	\$1.50	N/A	N/A	
Estimated Usage/DU or Room	N/A	N/A	\$1,200	\$1,200	
Estimated Total Useage	\$746,636	\$193,559	\$360,000	\$1,096,800	
City Utility User Tax Rate	12.5%	12.5%	12.5%	12.5%	
Total Electric UUT:	\$93,329	\$24,195	\$45,000	\$137,100	\$299,624
Gas	1 1	1	1	1	
Estimated Usage/SF	\$0.30	\$0.20	N/A	N/A	
Estimated Usage/DU or Room	N/A	N/A	\$300	\$300	
Estimated Total Useage	\$89,596	\$25,808	\$90,000	\$274,200	
City Utility User Tax Rate	10.0%	10.0%	10.0%	10.0%	
Total Gas UUT:	\$8,960	\$2,581	\$9,000	\$27,420	\$47,960
Communications	1 I	1	1	1	
Estimated Usage/SF	\$0.75	\$0.75	N/A	N/A	
Estimated Usage/DU or Room	N/A	N/A	\$400	\$1,500	
Estimated Total Useage	\$223,991	\$96,779	\$120,000	\$1,371,000	
City Utility User Tax Rate	9.0%	9.0%	9.0%	9.0%	
Total Communications UUT:	\$20,159	\$8,710	\$10,800	\$123,390	\$163,059
Total Annual UUT:	\$122,448	\$35,486	\$64,800	\$287,910	\$510,644



3.

The City of LA imposes a 10% tax on paid parking facilities. The Analysis assumes that the project will generate parking revenues from its office and hotel land uses. Applying a parking utilization rate and a \$10 daily rate yields \$205,000 in

annual parking taxes.

Office	
Occupied Office SF	129,039
Parking Utilization Rate	2/1,000 SF
Avg. Daily Parking	258
Hotel	
Number of Rooms	400
Average Parking Utilization Rate	76%
Avg. Daily Parking	304
Total Daily Parking	562
Average Parking Rate	\$10.00
Annual Parking Revenue	\$2,051,587
City Parking Tax Rate	10%
Annual Parking Tax to City	\$205,159



The City of Los Angeles imposes a business tax rate based on the relevant "fund category," which is based on the type of business. Retail sales are taxed at a rate of \$1.27 per \$1,000 in gross receipts and professionals are assessed taxes at a rate of \$4.50 per \$1,000 in gross receipts.

Based on the projected gross receipts per square foot, the project's estimated business tax total is \$452,500.

Class	Fund Category	Land Use	Tax Rate	Est. Gross Receipts/ Bus. Activity	Bi	us. Taxes
4	Retail Sales	Retail/Restaurants	0.00127	\$119,461,680	Ś	151,716
4	Retail Sales	Hotel	0.00127	\$8,210,000	\$	10,427
9	Professions & Occupations	Office	0.00450	\$64,519,650	\$	290,338
			Tot	al Business Taxes:	\$	452,500



IV. Economic Benefits



Construction

Based on construction activity, the Project is estimated to generate 3,495 FTE direct on-site construction related job-years*, approximately \$245 MM in direct labor income, and over **\$1 billion** in economic output through direct, indirect, and induced economic activity countywide (rounded).

	Employment	Labor Income	Economic Output
Direct (On-Site)	3,495	\$244,996,439	\$588,190,026
Indirect	1,378	\$84,908,096	\$207,298,357
Induced	1,543	\$80,386,243	\$228,722,547
Total Countywide	6,416	\$410,290,777	\$1,024,210,930
Estimated City Capture	4,956	\$327,643,609	\$806,200,478

Notes:

* A job-year is defined as one year of employment for one employee.

100% of direct benefits estimated to be captured on-site within the City

50% of indirect and induced benefits estimated to be captured off-site within the City based on City share of total County employment base Values in 2017 dollars





Based on development activity, the Project is estimated to generate 1,760 FTE permanent, direct on-site jobs, approximately \$73.2 MM in direct labor income, and \$210 MM in economic output through direct, indirect, and induced economic activity countywide (rounded).

	Employment	Labor Income	Economic Output
Direct (On-Site)	1,760	\$73,195,792	\$117,940,060
Indirect	192	\$12,155,236	\$33,050,652
Induced	399	\$20,775,575	\$59,113,605
Total Countywide	2,403	\$106,126,603	\$210,104,317

100% of direct benefits estimated to be captured on-site within the City.

50% of indirect and induced benefits estimated to be captured off-site within the City based on City share of total County employment base. Estimated ongoing benefits upon build-out and stabilization. Values in 2017 dollars

Annual Gross Fiscal Revenues are projected to exceed \$8.5 million. Upon completion and stabilization, an estimated 1,760 (FTE) jobs will be created onsite, generating over \$73.2 million in labor income.

Fiscal Revenues	
Annual Gross Fiscal Revenues (Rounded)	\$8,530,000
Construction Jobs	
Estimated Direct On-Site Jobs	3,495
Estimated Indirect Jobs	1,378
Permanent Jobs from On-Going Operations	
Estimated Direct On-Site Jobs	1,760
Estimated Indirect Jobs	192

SOURCE: City of Los Angeles, Finance Department, Los Angeles County Assessor's Office, IMPlan & Kosmont Companies





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