Glaser Weil

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October 12, 2017

VIA E-MAIL

Chairman Huizar and Honorable Councilmembers
Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, California 90012
c/o Zina Cheng, Deputy City Clerk
clerk.plumcommittee@lacity.org

Re: 12553-12575 West Beatrice Street
Council File No. 17-1041
Case Nos. CPC-2016-1208-CU-SPR; ENV-2016-1209-MND
PLUM Hearing Date: October 17, 2017

Dear Chairman Huizar and Honorable Councilmembers:

We are writing on behalf of the applicant, NSB Associates, Inc. (the "Applicant"), in support of the project located at 12553-12575 West Beatrice Street, Los Angeles, California 90066 (the "Project"). The Project will develop a new creative office building designed by world-renowned architect Frank Gehry and will also retain an existing low-rise creative office building housing Gehry Studios on the site. This innovative campus project has garnered widespread support from community stakeholders, businesses, the Council Office and the Del Rey Neighborhood Council.

On July 27, 2017, the City Planning Commission, after a lengthy public hearing, unanimously approved the Project. An appeal is now before you, filed by the owner of adjacent commercial property. We respectfully request that your committee deny the appeal and approve this well thought-out Project which will bring jobs, excellent design, open space and pedestrian amenities to a vibrant commercial area of Playa Vista.

1. The Applicant Has Engaged the Community and Its Neighbors.

The current Project design is the result of a lengthy process during which the Applicant worked with the Del Rey Neighborhood Council, the Council Office, and neighbors to enhance the Project design and seek to address all concerns. Both the Neighborhood Council and the Council Office have given their support to the Project. The Applicant has worked directly with the appellant to try to address each issue

raised by the appeal. Since the original application numerous changes have been made to the Project including a substantial reduction in the building height and size, addition of driveways to distribute traffic, additional screening and landscaping, additional parking, and voluntary traffic measures to ensure motorist and pedestrian safety for the Project and the surrounding community. Letters of support from the community are attached to this letter as Attachment A.

2. The Project's MND Fully Complies with CEQA.

The appeal challenges the adequacy of the Project's Mitigated Negative Declaration ("MND"). Our review of the appeal, all comment letters, and their attachments reveals that no new environmental impacts nor substantive errors in the MND have been identified. All comments have been addressed in detailed responses from the City contained in the record. Additional information regarding noise analysis is attached to this letter as Attachment B. Neither the appeal nor the comment letters cite to any specific omissions or errors, and do not provide any legally cognizable evidence of a potential unmitigated impact. The MND demonstrates that the Project will mitigate all potentially significant impacts and will have no unmitigated impacts on the surrounding area.

3. The Project Meets All City Code Requirements.

The Property is zoned M2-1 and is currently used for creative office. As determined by staff and the Planning Commission, the Project meets all requirements imposed under the City Code, Urban Design Guidelines, and Community Plan, including use, height, scale, floor area, parking, and green building. The entitlements requested by the Applicant are Site Plan Review and a Conditional Use ("CUP") for major development[1]. No zone changes, variances, deviations, or exceptions are requested.

The Project will be developed below the applicable 1.5:1 floor area ratio ("FAR"). The Project includes extensive landscaped setbacks and areas for both public and private use. The maximum height of the new building will be 135, with an additional 20 feet for rooftop equipment. In addition, the existing low-scale converted warehouse building will remain at approximately 25 feet in height. This

[1] The Project approvals include a condition requiring that, prior to the issuance of building permits, a pending lot line adjustment to create a building site for the new building be finalized. As part of the lot line adjustment, a separate legal lot is created at the corner of Jandy Place and Beatrice Street. This legal lot is a landscaped open space area and will not be used for commercial or multi-family residential purposes; therefore, the Commercial Corner requirements cited by the appellant do not apply. Furthermore, despite assertions in the appeal, currently there are no other future actions that are required or anticipated for Project approval.

allows the Project to provide a mix of building types and scales in keeping with the neighboring properties.

The Project has been designed with the neighborhood context in mind. The Project design incorporates two creative office elements built over a fully screened and landscaped parking garage. The Project steps down in size and scale modulating in height between the two elements, with varying size floor plates accented by outdoor areas and extensive landscaping. The Project's height and scale are in keeping with the neighborhood context and are consistent with the varied creative office, commercial, and residential buildings in the Playa Vista area. All required Site Plan Review and CUP findings regarding General Plan consistency and scale and character are supported in the record. Some minor corrections to the Planning Commission's adopted findings are attached to this letter as Attachment C, and we ask that your committee adopt these revisions to the findings to ensure accuracy.

We appreciate this opportunity to address the issues that have been raised by the appeal. We look forward to addressing any other issues that may arise at the PLUM hearing on October 17, 2017.

Sincerely,

CLARE BRONOWSKI
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

cc: Jenna Monterrosa, Department of City Planning
Tricia Keane, Council District 11

ATTACHMENT A

Letters Of Support

To: *Jenny Monterrosa*
City of Los Angeles
Department of City Planning
Expedited Processing Section
200 N. Spring Street, Room 721
Los Angeles, CA 90012
jenna.monterrosa@lacity.org

Del Rey Neighborhood Council
delreync.org

From: *Matt Wersinger*
Chairman, Land Use & Planning Committee

Date: *December 7th, 2016*

Re: *Proposed Project at*
12575 Beatrice Street
Case No. CPC 2016-1208-(V)CU-SPR

Dear Ms. Monterrosa,

The Del Rey Neighborhood Council, at its meeting on November 10th, 2016, considered the proposed project at 12575 Beatrice Street. The applicant previously met with the Del Rey NC Land Use & Planning Committee on multiple occasions.

The community voiced several concerns during these meetings. Primary among them were concerns about the overall scale of the project and the traffic it would generate, both in the immediate vicinity as well as the neighborhood as a whole. There were further concerns about ensuring a pedestrian friendly interface at street level.

Over the course of many months, the developer worked to address the concerns of the neighbors as well as those of the Committee and made a number of changes to the project, including lowering the height and reducing the mass by 20%, reconfiguring the driveways to address the traffic flow, redesigning the streetscape of the project to be more pedestrian friendly, adding a food truck courtyard for neighborhood use, and agreeing to pay for street improvements above and beyond the recommendations of the traffic report.

Therefore, the Del Rey NC took the following position:

"The Del Rey NC supports the project at 12575 Beatrice Street with the following conditions:

- **Developer adjusts the traffic distribution in regards to the driveways to be no more than 50% of the traffic entering or exiting off Jandy**
- **Developer provides a green face on the rear of the building**
- **Developer agrees to fully fund a DOT approved lit school crosswalk at Inglewood and Beatrice**
- **Developer agrees to provide a sun/shadow study for review prior to the full board meeting.** [This was provided to the board]'

Should you have any questions, please contact me either via email at matt.wersinger@delreync.org or by telephone at 310.721.2980.

Sincerely,

Matt Wersinger
Chairman, Land Use & Planning Committee

CC: Mike Bonin, Councilman, 11th District, City of Los Angeles; Ezra Gale, Senior Planner, Council District 11; Department of Neighborhood Empowerment Early Notification System; Kevin Mansfield, NSB Associates; Michael Chait, Chait & Company; Scott Dellinger, DRNC President.

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

I am writing to express my absolute and unconditional support for the proposed redevelopment of the property located at 12575 Beatrice Street into a new Gehry-designed, approximately 200,000 square foot office building.

As a long-time employee of TBWA/Chiat/Day, which has been located in the vicinity of the proposed project for many years, I am very familiar with the neighborhood. It has been encouraging to witness the influx of new businesses, including some of Silicon Valley's most recognizable and creative companies, which has resulted in substantial economic development and growth.

I believe that the new Gehry-designed building would further the positive changes and growth that have already taken place by providing much needed creative office space to support the burgeoning creative and technology sector. In addition, the high quality design of this signature building would enhance the area's identity and aesthetics. Importantly, the proposed building's height, density, and massing are appropriately scaled for this particular area, and balance the need for additional office space while avoiding impacts to the adjacent community. In addition, the high quality design of the building would enhance the area's aesthetics, and I'm certain that employees and residents in the area, including TBWA/Chiat/Day's staff, would appreciate the amenities and open space that the new development would provide.

The City should support carefully and thoughtfully planned developments like this project, particularly in an area which could use the additional amenities and space. Please approve the project.

Sincerely,

Lee Clow

Chairman, TBWA/Media Arts Lab

12539 Beatrice St, Los Angeles, CA 90066

1349832.1

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as a show of unwavering support for the proposed office building at 12575 Beatrice Street. I call Playa Vista my home and place of work - albeit separate addresses - and am thus vested and sensitive to what happens here. My reasons for support follow.

There are few places in Los Angeles that have seen the kind of explosive growth Playa Vista has seen and it has quickly become the creative and technology hub of Los Angeles, attracting the best and brightest minds and businesses. Having been born and raised here I come from an authentic and passionate place and want only what's best for this special community.

When I heard Frank Gehry was behind this project, it had my full attention and immediate support given his thoughtful and timeless approach. He's a genius! There is no stopping the growth here as billions of tech dollars flow into what was once a sleepy seaside town, but we can and should control how we grow; through thoughtful and meaningful design. Mr. Gehry's brilliance should not only be supported, it should be celebrated and used as the barometer to which all future projects are based.

As a resident and local business owner, I am thrilled at the prospect of driving by a Frank Gehry project each day on my way to and from the office. If I'm lucky, I'll get to move my office here one day.

Sincerely,

John Kendall - Playa Vista resident and business owner

John Kendall

12777 W. Jefferson Blvd.
Los Angeles, CA 90066
(213) 215-2627

July 24, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street. For the following reasons, I am excited about the prospect of a Gehry-designed building in this area.

I know the community well, and I am committed to encouraging its continued growth. Without question, this project is the type of smart, business-friendly, and community friendly development that should be encouraged. I'm certain this building is one that any community would proudly welcome and want to showcase.

Furthermore, the addition of this particular office building would do much more than help to satisfy the demand for creative office space: The building's unique design and street level improvements combine to create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents. I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

Sincerely,

Matthew Adamczyk

8238 W. Manchester Ave., Apt #107
Playa del Rey, CA. 90293

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street — CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept my **strong support** for the proposed building at 12575 Beatrice Street. I am a thirty-year active Venice community member, where Silicon Beach began with Digital Domain's presence in the 1990's – and Frank Gehry honed and developed his phenomenal practice.

I am sensitive to the impacts and benefits new development can produce. The subject building will not only provides space for the continued expansion of the digital arts and the broad variety of internet-based businesses the neighborhood has harvested so well but its sensitive exterior design has the building growing from the earth as its partner, rather than by typical dominance. The Green interior reflects this partnership promoting sustainability as our new standard. The extra parking is a boon to the entire neighborhood and a chance to lessen the gap between the historic citywide shortfall and our growing persistent need.

Even beyond the aesthetics, I would ask that the broad public benefits: local open space, pedestrian improvements, bike-ability and the overall compatibility with the neighborhood be sufficient to grant the project your approval as proposed.

Very Sincerely,

Jack V. Hoffmann
45 Market St.
Venice, CA 90291

July 24, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

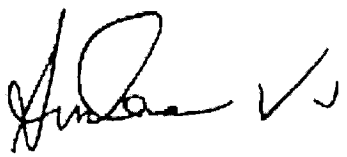
Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street. I am excited about the prospect of a Gehry-designed building in this area.

I'm a resident in the Playa Vista community and a student at Loyola Marymount pursuing my MBA. I spend much of my time in the area and am committed to encouraging its continued growth. Additionally, my career has been focused in technology start-ups in and around "Silicon Beach". This project is the type of smart, business-friendly, and community friendly development that should be encouraged. I'm certain this building is one that any community would proudly welcome and want to showcase.

Furthermore, the addition of this particular office building would do much more than help satisfy the demand for creative office space: The building's unique design, and street level improvements will create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents. I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

Sincerely,



Andrew Vu
6020 Seabluff Drive #219
Playa Vista, CA 90094

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street, Los Angeles (Playa Vista) – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street, Los Angeles (Playa Vista). I own a condo nearby and am an active stakeholder in the Playa Vista and surrounding community.

This Gehry-designed building in my neighborhood will be a wonderful benefit to the community and is representative of the type of smart growth development that is needed.

Larry Field has been an exceptional developer and investor throughout West Los Angeles. His projects in Venice are great examples of how he has successfully embraced the community and offered high quality jobs for the community. I have complete confidence in the quality of this development based on my review of the project and Larry's exceptional track record of delivering as promised over many decades.

The addition of this particular office building would do much more than help to satisfy the demand for creative office space: The building's unique design and street level improvements combine to create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents. I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

I encourage the City Planning Commission to approve this project.

Sincerely,

David Dittmer
4141 Glencoe Ave., #409
Marina del Rey, CA 90292

July 21, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street. For the following reasons, I am excited about the prospect of a Gehry-designed building in this area.

Although I currently don't live in Playa Vista, I know the community well, and have many personal friends who live there. Without question, this project is the type of smart, business-friendly, and community friendly development that should be encouraged and treasured. I'm certain this building is one that any community would proudly welcome and want to showcase.

Furthermore, the addition of this particular office building would do much more than help to satisfy the demand for creative office space: The building's unique design and street level improvements combine to create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents.

I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

Sincerely,

Jason A. Fine
202 N. Irena Ave. #A
Redondo Beach, CA 90277

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street. For the following reasons, I am excited about the prospect of a Gehry-designed building in this area.

I know the community well, and I am committed to encouraging its continued growth. Without question, this project is the type of smart, business-friendly, and community friendly development that should be encouraged. I'm certain this building is one that any community would proudly welcome and want to showcase.

Furthermore, the addition of this particular office building would do much more than help to satisfy the demand for creative office space: The building's unique design and street level improvements combine to create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents. I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

Sincerely,

Tammy Wong

Address: 8300 Manitoba Street #207, Playa Del Rey CA 90293

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street, Los Angeles (Playa Vista) – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street, Los Angeles (Playa Vista). I am enthusiastic about the prospect of a Gehry-designed building in my neighborhood.

I am a condo owner in the Playa Vista community at The Esplanade development at 13080 Pacific Promenade Dr., Playa Vista. I live in the condo full time and often take my grandson to the park and walking in the community.

The development proposed by Larry Field and Frank Gehry will be a nice addition to the neighborhood and support the local community. I have learned about Larry's strong character and impressive resume of improving communities from my son, Britten Shuford. I believe that the proposed development is appropriate for the neighborhood and represents smart, business-friendly and community friendly development.

I encourage the City Planning Commission to approve this project.

Sincerely,

June Halstead

June Halstead
13080 Pacific Promenade Dr.
Playa Vista, CA 90094

July 25, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street — CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

Please accept this letter as an expression of my support for the proposed office building at 12575 Beatrice Street. For the following reasons, I am excited about the prospect of a Gehry-designed building in this area.

I know the community well, and I am committed to encouraging its continued growth. Without question, this project is the type of smart, business-friendly, and community friendly development that should be encouraged. I'm certain this building is one that any community would proudly welcome and want to showcase.

Furthermore, the addition of this particular office building would do much more than help to satisfy the demand for creative office space: The building's unique design and street level improvements combine to create precisely the type of development that could activate the area by making it a more inviting space to be enjoyed by pedestrians, professionals, or residents. I believe the City Planning Commission should approve this project and do whatever it can to encourage similar efforts.

Sincerely,

Digitally signed by Patty Wu
DN: cn=Patty Wu, o, ou, email=pattyhwu@gmail.com, c=US
Date: 2017.07.25 14:41:10 -07'00'

6400 Crescent Park East #108
Playa Vista, CA 90094

cabbage patch

July 26, 2017

President Ambroz and Honorable Commissioners
City of Los Angeles Planning Commission
200 North Spring Street, Mail Stop 395
Los Angeles, California 90012-2601

Re: 12575 Beatrice Street – CPC-2016-1208-CU-SPR; ENV-2016-1209

Dear President Ambroz and Honorable Commissioners:

I am the Managing Partner of Cabbage Patch, which is a farm-to-table café located at 12531 Beatrice Street, with additional locations in Beverly Hills and Downtown on 6th Street. Cabbage Patch has operated on Beatrice Street for approximately eight years, and takes great pride in serving and nourishing both employees and residents in the surrounding area.

As the manager of a small business, I support all efforts to enhance and improve the community which supports and sustains the business. That is why I fully support the proposed Gehry-designed office building at 12575 Beatrice Street, and feel compelled to write to implore you to support it as well.

There is a noticeable absence of quality office facilities and open space in this particular area. The additional office space would not only help meet the growing demand for such quality creative workspace, but we anticipate that it would have the added benefit of increasing the number of people that would support local businesses. Such support is essential to the continued growth and development of the community, including my restaurant.

I also believe that this project would help activate the street and improve the pedestrian experience, which would further enhance and positively impact the neighborhood. The project's design and amenities clearly show that much thought and effort has gone into redeveloping a property that would be appreciated by all, and we have no issues with its height, mass, or scale. So, please approve the project as proposed.

Sincerely,

Harold Karsenty

C/O Cabbage Patch Restaurants LLC
12531 Beatrice Ave. LA 90066 CA

1349834.1

ATTACHMENT B

Noise Analysis Additional Information

Responses to Noise Analysis Peer Review (Peer Review) from DKA Planning, dated July 26, 2017, on the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the New Beatrice West Project (ENV-2016-1209-MND) are provided below. The numbering system corresponds with brackets added to the Peer Review to address each point clearly.

It should be noted that the Peer Review was dated July 26, 2017 and received by the City on July 27, 2017, outside of the IS/MND comment period and notably submitted by hand at the last minute at the City Planning Commission hearing on the project. Notwithstanding the late submittal, the following responses are provided.

COMMENT 1

On-Site Construction Noise Impact: Compliance with regulatory standards does not by itself ensure a less than significant impact.

Checklist Question 3.12(d) reads as follows:

Would the project result in ... [a] substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

In response to this checklist item on page 3-46, section (d), of the noise analysis, the analysis states that "[a]s discussed in Response to Checklist Question 3.12(a), the proposed project would result in a less than significant impact related to construction with implementation of Mitigation Measures XII-20 through XII-27 ." However, Checklist Question 3.12(a) only considers whether a project would generate noise or expose persons to noise "in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies." However, the response to Checklist Question 3.12(a) never quantitatively or qualitatively demonstrates that the project would not cause a significant increase in noise levels at nearby sensitive receptors and inappropriately reasons that the project's construction noise impact would be less than significant because it would comply with LAMC Section 112.05 and other city regulations pertaining to construction activities. But compliance with regulatory requirements is compulsory, and compliance with local and other regulations does not by itself guarantee or prove that a project would not result in "substantial temporary or periodic" increases in ambient noise levels in the project vicinity, the matter raised by Checklist Question 3.12(d).

The City of Los Angeles has published guidance defining what constitutes significant construction noise impacts. According to the L.A. CEQA Thresholds Guide, "A project would normally have a significant impact on noise levels from construction if...[c]onstruction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use .... " The analysis has utilized a similar 5 dBA threshold to determine the significance of the project's off-site construction noise impacts from construction vehicles, and therefore considers a 5 dBA threshold to be appropriate for the evaluation of the project's construction noises. As such, the L.A. CEQA Thresholds Guide's 5 dBA threshold should be utilized to determine the significance of the project's construction noise impact with respect to Checklist Question 3.12(d).

RESPONSE 1

The IS/MND utilizes the Los Angeles Municipal Code (LAMC) noise regulation standard to assess construction noise, while it applies the 5 dBA noise increase threshold to noise from project operations. (IS/MND, p. 3-39.)

The L.A. CEQA Thresholds Guide (Thresholds Guide) is “a guidance document that draws together practical information useful to City staff, project proponents, and the public involved in the environmental review of projects subject to the California Environmental Quality Act (CEQA). The Thresholds Guide is

a resource available to provide information to those interested in the CEQA process." (Thresholds Guide Introduction, p. 1.) The Thresholds Guide is not a binding document and has not been adopted by the City Council. Rather it is a reference guide for those interested in the CEQA process. The Thresholds Guide is not meant to "impact the existing discretionary authority of decisionmakers" and does not change the authority of the lead agency to "determine significance thresholds on a case-by-case basis dependent upon unique environments, evolving regulatory requirements, and the nature of projects encountered by each lead agency." (Thresholds Guide Introduction, p. 2.)

The Thresholds Guide was issued in 2006 and does not contain the most up-to-date information regarding noise impacts for construction equipment, as many types of mitigation and state of the art technologies have changed. Therefore, the Thresholds Guide is not the most recent or up to date guidance in all situations. The Thresholds Guide is also not binding on the City, but rather the City has the discretion to utilize additional standards and practices to guide the measurement of potential noise impacts. With respect to construction noise, in Categorical Exemption and MND cases, the City uses a different standard when assessing potential noise impacts from in-fill development. According to City practice, compliance with regulatory measures including LAMC Chapter XI, Article 2, Section 112.05 for construction noise may be used to demonstrate that the project will not result in a significant impact. The LAMC noise regulations regulate a number of aspects of construction noise, including hours of operation, best practices, and noise levels. Under this standard, the IS/MND must demonstrate that the project as designed or mitigated will comply with LAMC Section 112.05, that all feasible noise mitigation will be required, and that construction noise as mitigated will not exceed the 75 dBA limitation within 50 feet. (See for example, CP-7828, Class 32 CE Specialized Instructions.)

Further, the Thresholds Guide includes an incorrect methodology for quantification of construction noise levels. The Thresholds Guide (p. I.1-3 to I.1-4) states that projected noise levels at the time of construction should be quantified as CNEL. CNEL is a weighted 24-hour measure of sound levels. CNEL includes a 10 dBA penalty for the hours of 10:00 p.m. to 7:00 a.m. and an additional 4.77 dBA penalty for the hours of 7:00 p.m. to 10:00 p.m. The use of this 24-hour metric would unfairly represent the short-term increase in noise levels expected from construction activity. The California Department of Transportation (Caltrans) has established a methodology to convert between CNEL and Leq and vice versa. However, it would be inaccurate to translate the stated 5 dBA CNEL threshold into an hourly noise level (Leq) increase and there are a number of assumptions that are necessary in order for the conversion to work. First, the assumption that each of the 24 hourly traffic mixes remains constant and that traffic speeds do not change. Second, the method assumes that the peak hour traffic coincides with the worst-hour Leq, which is often not true. Nevertheless, the methods of conversion discussed may be used if only average daily traffic (ADT) volumes are known and a reasonable estimate can be made of the percentage of peak hour traffic volume of the ADT. Another requirement is a reasonable estimate of the day and night traffic volume split for Ldn and day, evening, and night split for CNEL.[1] As such, as numeric thresholds and not measured noise levels, it is not possible to convert the 5 dBA CNEL threshold to an hourly Leq noise threshold.

With respect to construction noise, the City has concluded that it would be improper to utilize an incremental noise level increase of 5 dBA CNEL to assess construction noise from in-fill projects, in part because construction activity is inherently noisy and will always be clearly audible when adjacent to developed properties. To further reinforce the inaccuracy of using this metric, most major jurisdictions (City of Santa Monica, City of San Francisco, City of San Diego) within California do not use a CNEL incremental increase threshold because it is inaccurate for describing short-term noise impacts associated with construction noise.

[1] Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol, p.2-55*, September 2013.

Multiple recent examples of City precedent verify the City utilizes the LAMC noise regulations to assess construction noise impacts in the City. Recent examples of IS/MNDs that used compliance with the LAMC to assess short-term construction noise impacts are provided below for reference.

- Environmental Case: ENV-2016-3749-MND, published July 13, 2017. The Project would construct a 33-story, up to 450-foot tall mixed-use building, which would include a new hotel with up to 200 rooms, approximately 49,227 square feet of office space, approximately 28,490 square feet of retail/restaurant floor area, and up to 250 residential condominium units including 18 very-low income units. The proposed building's total gross area would be approximately 420,000 square feet. The Project would include approximately 27,070 square feet of open space, 279 residential parking spaces and 266 non-residential parking spaces, for a total of 545 parking spaces. The Project would provide 286 long-term bicycle storage lockers and 58 short-term bicycle storage spaces for a total of 344 bicycle parking spaces. The Project Site is approximately 100 feet northwest of the Metro Vermont/Wilshire rail station.
  - Please see Pages IV-87 through IV-89 for the discussion and application of the City's noise regulations:
    https://planning.lacity.org/staffrpt/mnd/Pub_071317/ENV-2016-3749.pdf

- Environmental Case ENV-2016-1414-MND, published October 27, 2016. The approximate 2.14-acre (93,632-square-foot) Project Site is currently developed with the existing Galleria Building, a 1-story porte cochere at the south side of the Galleria Building, and a 155-space (49,744 square-feet) surface parking lot. As part of the adaptive reuse of the Galleria Building, the Applicant would add approximately 8,708 square feet of floor area to the Galleria Building roof, to provide 14 hotel rooms and associated roof-top amenities, with 146 hotel rooms and associated improvements accommodated within the existing floor area of the Galleria Building. The new mixed-use buildings would be constructed within the existing surface parking lot. The 7-story mixed-use building would contain 190 condominium units and approximately 2,270 square feet of ground floor commercial uses, and the 35-story mixed use building would contain 355 condominium units and approximately 2,832 square feet of ground floor commercial uses.
  - Please see Pages B-83 through B-97 for the discussion and application of the City's noise regulations:
    http://cityplanning.lacity.org/staffrpt/mnd/Pub_102716/ENV-2016-1414.pdf

- Environmental Case ENV-2015-3277-MND, published March 3, 2016. Option A consists of 250 residential units, 1,700 square feet of commercial office space, and an ancillary 300 square-foot coffee bar for residents, office tenants, and park visitors within a 233,337 square-foot, variable height structure that varies from 54-feet at its lowest point to 85-feet tall at its highest point. Total proposed parking would be 368 spaces (360 residential parking spaces and 8 commercial office parking spaces) and 279 bike parking spaces. The proposed development would provide 28,817 square-feet of open space as well, which is a surplus of 1,317 square-feet over what is required. Option B proposes a mixed-use residential development with two separate buildings. The first building (Building 1) would be comprised of 165 condominium units, 10,000 square feet of commercial office space with a total floor area of 167,402 square feet within a 66-foot tall , building with four levels of residential over two levels of commercial space. Approximately 349 parking spaces and 185 bicycle parking spaces would be provided within Building 1. Building 2 would be an approximately 36,905 square foot self-storage building approximately 45 feet in height with three levels of storage over one level of on-grade parking with 25 parking stalls and 12 required bicycle parking spaces. The total proposed floor area for both buildings is 204,307 square feet.
  - Please see Pages IV-78 through IV-86 for the discussion and application of the City's noise regulations:
    http://cityplanning.lacity.org/staffrpt/mnd/ENV-2015-3277.pdf

COMMENT 2

On-Site Construction Noise Impact: less than significant impact determination is unsubstantiated as the effectiveness of mitigation is unquantified.

As shown in Table 3-8 of the noise analysis, four receptors are projected to experience construction related noise level increases in excess of the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold for construction activities lasting more than ten days in a three-month period. Table 3-8 does not include the two noise-sensitive receptors discussed above that were not identified and analyzed. According to the analysis, "Multi-family Residences to the south" are projected to experience a noise level increase of 26.9 dBA; Digital Domain, 11.6 dBA; 740 Sound Design, 10.4 dBA; and "Single-family Residences to the east," 13.0 dBA. The analysis finds that Regulatory Compliance Measures RC-NO-l through RC-NO-4 and Mitigation Measures XII-20 through XII-27 would be capable of mitigating these noise increases to a less than significant degree, but offers limited evidence as to why these measures would suffice, failing to disclose the mitigated construction-related noise levels that would be experienced by receptors with the implementation of these measures.

Further, the analysis offers no further explanation of how the proposed regulatory compliance and mitigation measures would adequately mitigate the project's on-site construction noise impacts, failing to quantitatively or qualitatively demonstrate the effectiveness of the proposed mitigation. The analysis claims that "other mitigation measures, while difficult to quantify, will assist in controlling construction noise. Therefore, impacts related to on-site construction noise would be less than significant with mitigation incorporated." But just because these mitigation measures may "assist in controlling construction noise" does not at all mean that they would be capable of reducing construction noises to a less than significant impact.

For example, Mitigation Measure XII-20 additionally requires "state-of-the-art noise shielding," and

Mitigation Measure XII-26 requires the placement of "flexible sound control curtains ... around all drilling apparatuses, drill rigs, and jackhammers." However, the analysis does not quantify the mitigating potential of this shielding in any way, let alone describe what a "state-of-the-art" noise barrier would even be. According to the Federal Transit Administration, sound barriers can be expected to attenuate noises by 5 to 15 decibels only.[1] Even considering a full 15 dBA of barrier mitigation and 3 dBA of muffler mitigation, the multi-family residences 50 feet south of the project would still be projected to experience a construction-related ambient noise level of 71.5 dBA Leq, an increase of 9.4 dBA above their existing ambient noise conditions; and 4.4 dBA above the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold for temporary construction activities lasting more than ten days in a three month period.

Further, this analysis does not consider that because these residences are 4-story multi-family structures, they would not be capable of obstructing the line of sight travel of on-site construction noises to upper-story residential units at all 40 feet in height unless the project's "state of the art noise shielding" and "flexible sound control curtains" were exceedingly tall. The incorporation of equipment mufflers and temporary sound barriers required by Mitigation Measures XII-20 and XII-26 would not be capable of mitigating the project's construction noise impact at this multi-family residence to below the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold.

Moreover, the total mitigation potential of these measures when combined with the project's other proposed measures could still be inadequate. Mitigation Measure XII-21 would only "prevent additional noise due to worn or improperly maintained parts," not reduce noise levels from properly functioning equipment.

Mitigation Measure XII-22 would require the construction contractor to "use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment)." This measure is ambiguous and generally unenforceable, and the analysis fails to quantify the effect that it would have on construction noise levels.

Additionally, the analysis cites the reference noise levels of construction equipment in Table 3-6 of the noise analysis, as provided by the Federal Highway Administration's Roadway Construction Noise Model.

However, this database makes no distinction between the noise levels of rubber-tired versus steel-tracked equipment, as an equipment's noise level is primarily a product of its internal combustion engine noise. The EPA's Noise from Construction Equipment and Operations, Building Equipment and Home Appliances source cited in Table 3-7 also makes no such distinction. Use of smaller or otherwise less-effective equipment could even extend construction scheduling, lengthening the duration of the project's significant construction noise impacts.

Mitigation Measures XII-23 to XII-25 are similarly ambiguous or unenforceable and fail to establish how they would quantifiably reduce the project's on-site construction noise impacts to below the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold.

Mitigation Measure XII-26 would have no mitigating effect on the project's potential to result in significant noise impacts, as it would only address complaints after disturbances have already occurred, rather than prevent significant impacts from occurring in the first place. It is an end around to defer any mitigation of the project's significant impacts until after they have already occurred. Such a method placed the discretionary authority of who decides what constitutes as "reasonable measures" into the hands of the project itself.

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1. Federal Transit Administration, Transit Noise and Vibration Impact Assessment. May 2006.

2. If should be noted that the California Department of Transportation (Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 201 3) and the Federal Highway Administration (Noise Barrier Design Handbook.) concede that achieving 20 dBA of barrier attenuation is possible, though their design feasibility is considered "nearly impossible," Such a barrier would, at a minimum, require a transmission loss of 30 dBA or greater, achievable by materials such as concrete blocks, Needless to say, this would for exceed any realistic performance standard achievable by a temporary construction sound barrier, especially considering that it would have to fully obstruct the line of sight travel of sound between the project and its receptors. Even a barrier design capable of achieving 15 dBA of mitigation is considered "very difficult."

RESPONSE 2

As discussed in Response 1, above, the City utilizes the LAMC noise regulations as a threshold for construction noise for in-fill development in IS/MNDs rather than the 5 dBA CNEL incremental noise level cited in the Comment. Therefore, the commenter is applying the wrong threshold standard to this comment analysis. Pursuant to LAMC Section 112.05, maximum noise levels are limited to 75 dBA for construction equipment at a distance of 50 feet, where feasible. The 75 dBA at 50 feet noise limitation does not apply when all technically feasible mitigation has been applied, but compliance is still not attainable. It is important to note that the 75 dBA at 50 feet limitation relates to the noise generated at the equipment and not the noise level exposure at the off-site land uses. The noise levels shown in Table 3-8 of the IS/MND are shown for disclosure and not used for the impact determination.

Table 1 has been added to supplement the IS/MND to show potential quantitative decibel reductions for mitigation measures:

TABLE 1: NOISE MITIGATION MEASURES AND DECIBEL REDUCTION

Mitigation Measure	Description	Effectiveness	Notes
Mufflers	Most construction noise originates from internal combustion engines. A large part of the noise emitted is due to the air intake and exhaust cycle. Specifying the use of adequate muffler systems can control much of this engine noise. (https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook07.cfm)	Industrial Grade – 15 dBA https://www.nettinc.com/products/silencers-ver-2	Highly variable by equipment and muffler grade. Existing CEQA Thresholds Guide takes a fleetwide 3 dBA Reduction
Sound Curtains	Sound curtains generally take the form of sound absorptive mats hung from the equipment or on frames attached to the equipment. The aprons can be constructed of rubber, lead-filled fabric, or PVC layers with possibly sound absorptive material covering the side facing the machine. Sound curtains are useful when the shielding must be frequently removed or if only partial covering is possible. (https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook07.cfm)	Sound curtains may achieve noise reductions up to 10 dBA. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm	Best used for stationary activity like pile driving and drilling.
Soundwalls	Noise barriers can be constructed out of many materials, including wood and specialized acoustic materials.	5-20 dBA Professional experience and from soundwall company's specification sheets. https://www.acousticalsurfaces.com/temporary-barrier/echo-barrier.html	Highly variable depending on material, height, distance from the source to receptor, and line-of-site.

SOURCE: TAHA, 2017.

In addition, LAMC Section 112.05 sets maximum noise levels of powered equipment in "any residential zone of the City or within 500 feet thereof." The Project Site is not in a residential zone or within 500 feet thereof. The Project Site is zoned M2-1, which is a manufacturing zone. While there are residences within 500 feet of the Project Site, the residences are on property zoned (Q)C2-2, which is a commercial zone where residential uses are permitted under certain circumstances. Nevertheless, per RC-NO-1 (IS/MND, p. 3-47) in the IS/MND and the Project conditions, the Project will be bound by the LAMC Section 112.05 regulations to ensure mitigation of construction noise impacts. .

As demonstrated in the above **Table 1**, the IS/MND mitigation measures include a combination of mitigation measures that would quantitatively reduce noise levels and other measures designed to generally control noise. The combination of mitigation measures is reasonably anticipated to reduce equipment noise in compliance with LAMC Section 112.05.

Some measures are not capable or suited to quantitative analysis. For example, Mitigation Measure **XII-22** requires the construction contractor shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment). The prohibition of metal-tracked

equipment in favor of rubber-tired equipment would surely benefit adjacent land uses; however data on quantitative assessment is not available as the Federal Highway Administration's Roadway Construction Noise Model does not include rubber-tired and metal-tracked noise levels for the same piece of equipment to use in a comparative analysis.

Similarly, Mitigation Measures **XII-21**, **XII-23**, **XII-25**, and **XII-27**, are designed to qualitatively control construction noise. Mitigation Measure **XII-21** provides the contractor will ensure proper maintenance of all construction equipment, which will prevent additional noise due to worn or improperly maintained parts. Also, Mitigation Measure **XII-23** ensures the contractor will minimize the use of equipment or methods with the greatest peak noise generation potential. This can be done by staggering noisier activities and equipment on different days or segments of days. Mitigation Measure **XII-25** will locate construction staging areas away from sensitive uses, including but not limited to multi-family residences across Beatrice Street and single-family residences east of the Project Site. Also Mitigation Measure **XII-27** will implement a construction noise disturbance coordinator to respond to any local noise complaints and ensure that all reasonable measures are taken to resolve potential complaints.

Mitigation Measure **XII-20** requires state-of-the-art noise shielding and mufflers. At the present time, after-market mufflers typically reduce noise levels by at least 15 dBA.[2] This is in contrast to the outdated 2006 L.A. CEQA Thresholds Guide's very conservative assumption that mufflers only create a 3 dBA reduction. Use of more advanced present-day mufflers would reduce much of the equipment noise shown in Table 3-6 of the IS/MND to below 75 dBA at 50 feet (see **Table 1** for reduction). However, some equipment cannot be easily muffled, such as jackhammers. As a result, Mitigation Measure **XII-26** requires flexible sound curtains around jackhammers and drilling machines. Sound enclosures made of acoustical materials typically reduce noise levels by at least 10 dBA, while temporary sound walls can reduce noise levels by up to 20 dBA (**Table 1**).

Mitigation Measure **XII-24** prohibits gasoline powered generators, which are shown in Table 3-6 of the IS/MND to generate a noise level of 77.6 dBA at 50 feet. This measure would require use of quieter electric sources to further reduce construction noise impacts. Plug in electric and solar powered generators do not generate audible noise like gasoline generators, as there is no combustion process involved in the production of electricity.

The comment letter notes that mitigating noise levels at the fourth level of adjacent land uses would be exceedingly difficult. The windows are over 40 feet high and overlook the Project Site. LAMC Sec. 112.05 is enforced at ground level at a distance of 50 feet from the noise source. It would not be technically feasible to mitigate noise levels at the multi-family residence as it is necessary to break the line-of-sight between a noise source and receptor in order to reduce noise levels when using a sound wall or sound curtain. A 40-foot tall sound wall or sound curtain is not a feasible option for mitigation. As discussed above, the IS/MND and Project conditions would include numerous mitigation measures that would reduce noise levels to the greatest extent technically feasible.

Again, all equipment will be operated intermittently during permitted construction hours and impacts are temporary. As such, so long as the equipment is operated in accordance with the LAMC regulations and with all mitigation applied, impacts are not anticipated to be significant.

COMMENT 3

On-Site Construction Noise Impact: Two studio receptors not identified and/or analyzed.

[2] NETT Technologies Inc., *Silencers*, available at https://www.nettinc.com/products/silencers-ver-2.

On page 3-40 of the New Beatrice West Project Initial Study/Mitigated Negative Declaration, the noise analysis conducted identifies the following noise-sensitive receptors within 500 feet of the project:

- Multi-family residences located 50 feet to the south across Beatrice Street;
- Single-family residences located approximately 300 feet to the east of the project site but approximately 600 feet east of the construction zone;
- 740 Sound Design located adjacent to the project site but 350 feet east of the construction zone; and
- Digital Domain located approximately 300 feet west to the west. [sic]

The analysis goes on to note that "[t]he above sensitive receptors represent the nearest sensitive locations with the potential to be impacted by the proposed project. Additional sensitive receptors are located within 500 feet of the project site, but these receptors would be somewhat shielded from construction activity by the buildings immediately surrounding the project site." However, there are at least two additional noise-sensitive studio land uses exist within 500 feet of the project site, and neither would be shielded from the project's construction activities. ATN Stages is a studio land use located approximately 80 feet west of the project site at 5415 Jandy Place. Vista Studios is also a studio land use, and it is located approximately 110 feet west of the project site at 12615 Beatrice Street. No existing building, wall, or other structure would obstruct the line of sight travel of construction noise from the project to these noise-sensitive receptors.

On Thursday, May 25, 2017, from 3 to 4 P.M., DKA Planning measured ambient noise *levels* at ATN Stages and Vista Studios. ATN Stages was found to have an existing ambient noise level of 59.1 dBA 4q; Vista Studios, 61.0 dBA L_{eq}.[3] Following the noise study's methodology for determining construction noise impacts, ATN Stages would be projected to experience construction noise levels of 84.9 dBA L_{eq} during the project's grading/excavation and finishing phases, an increase of 25.8 dBA over this receptor's existing ambient noise conditions. This would far exceed the 5 dBA noise increase threshold considered to be a significant noise impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period. Vista Studios would be projected to experience construction noise levels of 82.2 dBA L_{eq} during the project's grading/excavation and finishing phases, an increase of 21.2 dBA over existing ambient conditions. This would also exceed the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold. Even if the nearest measured ambient noise level of 62.1 dBA L_{eq} is used instead of those measured by DKA Planning, ATN Stages and Vista Studios would still be predicted to experience construction-related ambient noise level increases of and 22.8 dBA and 20.1 dBA, respectively.

RESPONSE 3

This comment references the incorrect 5 dBA noise increase threshold taken from the Thresholds Guide (see Response 1). Using the methodology utilized in the IS/MND, it is not anticipated that significant adverse noise impacts will occur at the two locations identified in the comment.

It should be noted that the Thresholds Guide does not identify private studios or stages as “noise sensitive uses”. According to the Thresholds Guide, noise sensitive uses include “residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks.” However, most noise assessment guidance documents, such as the Federal Transit Administration’s (FTA) Transit Noise and Vibration Impact Assessment Manual, consider recording studios sensitive receptors. As such, the IS/MND analyzed 740 Sound Design and Digital Domain as potential sensitive receptors. The IS/MND concluded there would be no substantial noise impacts to these identified private sound studio uses.

In addition, the comment references ATN Stages and Vista Studios. Regarding ATN Stages, this business was not identified during site visits to the project site prior to release of the IS/MND. Multiple online

business records searches (ReferenceUSA, Google, Los Angeles Department of Building and Safety) completed on August 10, 2017 showed no business by this name at the referenced location. A site visit on August 10, 2017 at this address showed a vacant storefront with locked doors and no furniture. Multiple employees and businesses from the surrounding area were asked if they knew of ATN Stages, but no one had heard of the company. This business does not appear to exist.

According to on-line sources, Vista Studios opened for business on May 15, 2017 (Facebook Post: Vista Studios). The IS/MND was published prior to this date on April 17, 2017. The project was not listed as a related project in the relevant list provided by the City of Los Angeles, and the Applicant had no reasonable way to know this future use was planned. The environmental baseline was set on April 17, 2017 and no additional analysis is required regarding this land use.

Furthermore, windows, walls, and insulation provide protection from prolonged noise exposure and interior noise levels are much lower than exterior noise levels. Closed single glazed windows for instance typically provide 25 dB of reduction from exterior noise levels.[3] It is assumed that a private studio which requires a quiet interior environment would include windows, walls, and insulation at a higher than average sound insulation level to provide protection from noise exposure. As stated on Vista Studio's website, the four sound stages provide seven tons of Sound Transmission Class (STC) rated HVAC at their lowest and 30 tons of STC rated HVAC at their highest.[4] This would provide additional protection from construction noise and business operations would not likely be affected by noise related to the Project. It is assumed that if ATN Stages exists, it would have similar noise insulation technology.

As discussed above, the combination of feasible mitigation measures imposed in the IS/MND and Project conditions, including the use of state of the art equipment, sound shields, sound curtains and mufflers, as well as the establishment of a noise disturbance coordinator to resolve any complaints, is anticipated to ensure that no significant construction noise impacts occur.

COMMENT 4

On-Site Construction Noise Impact: Undisclosed potential significant health impact.

According to the National Institute for Occupational Safety and Health (NIOSH), a federal agency under the Centers for Disease Control and Prevention (CDC), extended or repeated exposure to sounds at or above 85 dBA can cause hearing loss. In Table 3-8 of the noise analysis, the analysis projects the multifamily residential receptor located 50 feet south of the project site to experience a constructed-related noise level of 89.0 dBA Leq, without mitigation. Environmental exposure to this noise level would be considered hazardous after a duration of only 3 hours and 10 minutes, far shorter than a typical 8-hour construction work day.[4] The project's potential to expose nearby residents to hazardous levels of noise should be documented and further analyzed, especially given the questionable effectiveness of the proposed mitigation.

3. Noise measurements were taken using a Quest Technologies SoundPro Dl Sound level Meter, the exact meter used to conduct their ambient noise measurements. The Sound Pro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with on omni-directional microphone calibrated before the day's measurements and set 01 approximately five feet above the ground.

[3] Federal Highway Administration, *Analysis and Abatement Guidance, Table 6 Building Noise Reduction Factors,* available at https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and _abatement_guidance/polguide02.cfm

[4] Vista Studios, available at http://www.thevistastudios.com/stages/

4. National Institute for Occupational Safety and Health. Occupational Noise Exposure. 1998.

RESPONSE 4

Health impacts associated with elevated noise levels are largely an occupational hazard due to prolonged exposure, rather than a hazard to the general public based on intermittent and short term exposure. As stated by the National Institute for Occupational Safety and Health (NIOSH), "The NIOSH REL is an *occupational* exposure limit, and was set to protect workers from developing hearing loss –substantial enough to make it difficult to hear or understand speech – over the course of a forty-year working career."[5] As such it is clear the 85 dBA threshold being applied is incorrect for general environmental noise exposure.

In addition, all noise levels discussed in the MND are exterior noise levels, not accounting for insulation due to buildings, walls, insulation and windows. Further, noise levels decrease as the distance from the noise source to the receiver increases. The multi-family building 50 feet to the south of the Project Site would be exposed to noise levels of 89 dBA L_{eq}, without mitigation, but this is exterior noise at the property line. Windows, walls, and insulation provide protection from prolonged noise exposure and interior noise levels are much lower than exterior noise levels. Closed single glazed windows for instance typically provide 25 dB of reduction from exterior noise levels.[6] In addition, mitigation is expected to conservatively reduce sound levels by 3 dBA, resulting in an exterior noise level of 87 dBA L_{eq}. Therefore, the mitigated, interior noise level would be approximately 61 dBA, which is well below any level associated with hearing loss. It is likely the mitigated noise level would be lower as technology has improved significantly since the composition of the 2006 CEQA Thresholds Guide. However, it is difficult to quantify the mitigation as the 89 dBA L_{eq} noise level is a combined noise level and mitigation is applied on the individual equipment level. See **Table 1** for mitigation measures and possible decibel reductions.

Similarly, the single-family residences to the east of the Project Site would be exposed to noise levels of 67.6 dBA L_{eq}, without mitigation, but this is exterior noise at the property line. Windows, walls, and insulation provide protection from prolonged noise exposure and interior noise levels are much lower than exterior noise levels. Also, barriers such as buildings and berms, which break the line-of-sight between the source and the receiver greatly reduce noise levels. Noise levels are further attenuated with other absorptive surfaces, such as dirt, grass, and trees that separate single-family residences from the Project Site.

COMMENT 5

Off-Site Construction Noise Impact: Undisclosed potential noise impact from concrete mixing and pumping activities.

Contemporary construction frequently requires extensive concrete pumping activities to deliver concrete around construction sites for a variety of applications. This project could require additional concrete pumping or grout pumping for the installation of its auger cast displacement pile foundation, as recommended by Mitigation Measure GEO 1 of the project's geology and soils analysis.

To deliver concrete or grout on-site, diesel-powered pumping trucks pump concrete from mixing vehicles and transport it on-site with the use of extended booms. These vehicles are typically permitted to operate

[5] NIOSH, *Understanding Noise Exposure Limits: Occupational vs. General Environmental Noise*, February 8, 2016.

[6] Federal Highway Administration, *Analysis and Abatement Guidance, Page 2, Table 6 Building Noise Reduction Factors*, available at https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/ analysis_and_ abatement_guidance/polguide02.cfm

from public rights-of-way, closer to nearby receptors than construction activities that may occur on-site and behind any potential sound barriers. Concrete mixing vehicles may also form a queue on a public right-of-way while waiting to deliver their payload. For this reason, concrete pumping activities have an elevated potential to cause sustained and significant noise impacts at noise-sensitive receptors.

As shown in Table 3-6 of the project's noise analysis, concrete mixer trucks can produce a noise level of 74.8 dBA Leq at a distance of 50 feet; concrete pump trucks, 74.8 dBA Leq. Thus, a concrete pump truck and a single concrete mixer truck operating on Beatrice Street near the intersection of Jandy Place could produce a combined noise level of at least 77.6 dBA Leq at the multi-family residence at that location. A queue of multiple concrete mixer trucks would exacerbate this noise level, especially because concrete mixer trucks must remain operational and mixing while carrying their payload. A queue of three concrete mixer trucks, not uncommon, would elevate this noise level to 80.7 dBA Leq at the multi-family residence receptor. If concrete pump and mixing trucks were to operate from the Jandy Place right-of-way, similar impacts could occur at Vista Studios and ATN Stages. These impacts would exceed the L.A. CEQA Thresholds Guide's 5 dBA noise increase threshold. Given the unlikelihood that noise barriers or sound curtains could be installed on any public rights-of-way, it is questionable how these impacts could be mitigated at all. Clearly, more analysis is necessary with regard to this potentially significant impact.

RESPONSE 5

As discussed in Response 1, above, the City utilizes the LAMC noise regulations as a threshold for construction noise for in-fill development in IS/MNDs rather than the 5 dBA CNEL incremental noise level cited in the Comment. Therefore, the commenter is applying the wrong threshold standard to this comment analysis.

The IS/MND properly analyzed all construction related potential noise impacts, including maximum noise levels of a concrete mixing truck and a concrete pump truck. Pursuant to LAMC Section 112.05, maximum noise levels are limited to 75 dBA for construction equipment at a distance of 50 feet. As stated in the comment, Table 3-6 of the IS/MND shows that concrete mixer trucks typically generate a noise level of 74.8 dBA L_{eq} at a distance of 50 feet and concrete pump trucks typically generate a noise level of 74.4 dBA L_{eq} at a distance of 50 feet. As analyzed, construction activity would result in temporary increases in ambient noise levels in the Project Area on an intermittent basis, but would still be in compliance with the LAMC.

As discussed in Response 2, above, the project includes comprehensive mitigation measures to control noise from individual pieces of equipment, which would also reduce noise generated by multiple pieces of equipment. These mitigation measures would apply to concrete mixing and pumping and are reasonably anticipated to reduce equipment noise to be further below 75 dBA at 50 feet. (See **Table 1**) For example, Mitigation Measure **XII-21** provides the contractor will ensure proper maintenance of all construction equipment, which will prevent additional noise due to worn or improperly maintained parts. Also, Mitigation Measure **XII-23** ensures the contractor will minimize the use of equipment or methods with the greatest peak noise generation potential. This can be done by staggering noisier activities and equipment on different days or segments of days. Mitigation Measure **XII-25** will locate construction staging areas away from sensitive uses, including but not limited to multi-family residences across Beatrice Street and single-family residences east of the Project Site.

With the incorporation of these mitigation measures, the Project’s construction related impacts, including those associated with concrete mixing and pumping, will be less than significant.

COMMENT 6

Off-Site Construction Noise Impact: Undisclosed potential noise impact from off-site improvements in adjacent rights-of-way.

According to the project's description, the project's connection to existing utility infrastructure (e .g., water mains, sewer lines, etc.) "could require off-site improvements in adjacent rights-of-way." Such improvements could similarly require construction activities at off-site locations closer to receptors than construction activities that may occur on-site and behind any potential sound barriers. They also commonly require equipment such as backhoes, jackhammers, and mounted impact hammers. According to the construction source noise levels provided by the noise analysis in Table 3-6, each of these pieces of equipment would be capable of increasing noise levels at roadway-adjacent sensitive receptors, for example the multi-family residences directly south of the project site, by greater than the L.A. CEQA Thresholds Guide' s 5 dBA noise increase threshold for construction activities. It is unlikely that noise barriers or sound curtains could be installed on public rights-of-way and questionable how these specific impacts could be mitigated at all. Additional analysis is recommended with regard to this potentially significant impact.

RESPONSE 6

Comment 6 incorrectly asserts that off-site improvements and associated impacts were not considered and analyzed. In fact, potential off-site improvements and associated impacts were considered and analyzed in Table 3-6 of the IS/MND. In particular, Table 3-6 analyzed equipment noise levels, including those that might be used for potential off-site improvements (e.g., excavator, concrete pump truck, concrete saw, etc).

As discussed in Response 1, above, the City utilizes the LAMC noise regulations as a threshold for construction noise for in-fill development in IS/MNDs rather than the 5 dBA CNEL incremental noise level cited in the Comment. Therefore, the commenter is applying the wrong threshold standard to this comment analysis.

Any utilization of equipment for off-site improvements would be subject to the City's Standard Conditions of Approval (Regulatory Compliance Measures **RC-NO-1** through **RC-NO-3**) and would implement Mitigation Measures **XII-20** through **XII-27**, as appropriate. For example, Mitigation Measure **XII-23** requires that the contractor minimize the use of equipment or methods with the greatest peak noise generation potential. This can be done by staggering noisier activities and equipment on different days or segments of days. Mitigation Measure **XII-25** requires the contractor to locate construction staging areas away from sensitive uses, including but not limited to multi-family residences across Beatrice Street and single-family residences east of the Project Site. Therefore, as mitigated, the construction activity related to off-site improvements is also anticipated to be less than significant.

COMMENT 7

Off-Site Construction Noise Impact: Outdated traffic model, incorrect receiver setback distances, and use of peak hour traffic baselines understate the construction vehicle noise impact.

On page 3-43 of the project's noise impact analysis, the study explains that the off-site mobile construction noise impact from construction-related vehicles "was estimated using the Federal Highway Administration RD-77-108 calculation methodology." According to the FHWA, this traffic noise prediction model "was comprised of acoustic algorithms, computer architecture, and source code that dated to the 1970s. Since that time, significant advancements have been made in the methodology and technology for noise prediction, barrier analysis and design, and computer software design and coding."[5]

This traffic model has been obsolete since the 1998 release of TNM version 1.0. The FHWA's current traffic noise prediction model, TNM version 2.5, is presently the industry standard method for traffic noise prediction. While there is some discretionary as to the modeling tool used, the more contemporary TNM model is a more robust tool for modeling off-site mobile noise impacts from construction vehicles.

Ultimately, the analysis determined that excavation phase construction vehicle impacts could increase noise levels along Westlawn Avenue and Grosvenor Boulevard, between Beatrice Street and Jefferson Boulevard, by 3.6 dBA.[6] However, as shown in the noise appendix's "Mobile Noise With Haul Trips Analysis" calculation sheets, roadside noise levels were predicted from a distance of 50 feet from the right-of-way. Predicting roadway noise levels from this distance understates the noise levels that could be experienced by land uses along Westlawn Avenue and Grosvenor Boulevard. For example, multifamily residences along Westlawn Avenue are located no more than 15 feet from that roadway's right of- way, and approximately 40 feet from its centerline. Single-family residences along Grosvenor Boulevard are also located no more than 15 feet from that roadway's right-of-way, and no more than 35 feet from its centerline.

Further, the analysis modeled the noise impact of construction vehicles by adding their trips to the existing P.M. peak hour traffic volumes of West lawn Avenue, Grosvenor Boulevard, and Jefferson Boulevard. This is not advisable for the two reasons. First, vehicles such as haul and delivery trucks would access the site regularly during construction work hours, not just during peak hours of traffic. For example, the study estimates that approximately 19 haul trucks could access the project site per hour during the excavation phase. During peak hours of traffic with relatively higher noise levels, additional noise from 19 haul trucks would not have as great an incremental noise impact as during mid-day hours with reduced traffic levels. Noise increases related to haul trucks would clearly be more pronounced during mid-day, non-peak hours. By modeling the impact of construction vehicles during the peak hour only, the analysis ignored the potential for construction vehicles to contribute to significantly considerable noise increases of 5 dBA or greater during off-peak hours. Second, to further understate the potential noise impact from construction vehicles, the analysis modeled noise impacts using P.M. peak hour traffic volumes, specifically. In the noise appendix's "Mobile Noise With Haul Trips Analysis" calculation sheets, the analysis assigns Westlawn Avenue a total hourly traffic volume of 492 vehicles; Grosvenor Boulevard, 502 vehicles; and Jefferson Boulevard, 3609 vehicles. These traffic volumes are also utilized in their "CNEL Noise Estimates for the Proposed Project" appendix calculation sheet, which is "Based on [the] PM Peak Hour." According to page 18 of the project's traffic impact study, the P.M. peak hour for these roadways was determined to begin at 5 P.M.

It is inaccurate to use traffic volumes of such a late hour to model the project's construction vehicle impacts, as Regulatory Compliance Measure RC-NO-2 itself specifies that construction activities may not occur after 6 P.M., Monday through Saturday. By utilizing P.M. peak hour traffic volumes to model the impact of the project's construction vehicles, the analysis ignores the greater noise impact that these vehicles would have during other hours. Westlawn Avenue and Grosvenor Boulevard, in particular, have far lower traffic volumes during the A.M. peak hour than during the P.M. peak hour, let alone during non-peak times.

In summary, the analysis should reflect the project's off-site noise impact from construction vehicles with the following corrections:

- The FHWA's TNM 2.5 Noise Model should be used to project the off-site noise impact from construction vehicles, rather than the obsolete RD-77-108 methodology.
- Off-site noise levels should be predicted at roadway distances representative of actual receiver setbacks.

- Baseline existing traffic volumes should be representative of mid-day traffic conditions to conservatively predict the maximum noise increases that could be caused by the project's construction vehicles.

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6. Though the existing and existing plus construction truck results shown in Table 3·9 do not actually show a 3.6 dBA difference. While this is likely a typo. The "Mobile Noise With Haul Trips Analysis" calculation sheets in the noise appendix do show this 3.6 dBA increase in noise levels.

RESPONSE 7

Comment 7 states that a newer version of the Federal Highway Administration (FHWA) traffic noise model should have been utilized. In fact, the newer FHWA Traffic Noise Model (TNM) model is only required when evaluating new highway or roadway projects, as specified in the Caltrans, Traffic Noise Analysis Protocol (Protocol), August 2006. This Protocol applies to Caltrans and local agency projects that receive Federal funding or require FHWA approval action. As acknowledged in Comment 7, the City has discretion as to which model to be used to assess roadway noise from urban-infill projects. Comment 7 is inaccurate in stating that the older model is "obsolete."

Nevertheless, in response to the comment, an analysis was completed to demonstrate the similarity between the two models. A TNM model run was conducted for Westlawn Avenue between Jefferson Boulevard and Beatrice Street. The increase for the Future with Project conditions over the Future without Project conditions would be approximately 1.0 dBA CNEL, which is 0.1 dBA less than the increase calculated using the FHWA RD-77-108 calculation methodology. The resulting increase for Future with Project Conditions over Existing Conditions was 3.6 dBA CNEL, the same incremental increase calculated using the FHWA RD-77-108 calculation methodology. The distance from the center of the roadway to the receiver was approximately 40 feet. Thus, the two models do no result in any significant difference in application to this project.

Also to be conservative, model runs utilizing the newer TNM model were conducted using AM peak hour traffic volumes. The increase for the Future with Project conditions over the Future without Project conditions would be approximately 2.7 dBA CNEL, which is slightly higher than the 1.0 dBA CNEL increase disclosed in the IS/MND, but still below the 5 dBA CNEL threshold. The increase for the Future with Project condition over Existing conditions was 2.8 dBA CNEL, which is less than the 3.6 dBA CNEL disclosed in the IS/MND (IS/MND, p. 3-43) and less than significant. The TNM model runs are included as Attachment A. As demonstrated, the results of the TNM model (even including AM peak hour traffic) are substantially similar to or less than the RD-77-108 methodology and associated impacts would be less than significant.

Comment 7 also disagrees with the noise receptor distances used in the modeling. In regards to the original analysis's receptor distances, the CNEL or L_{eq} noise level at 50 feet is the normalized noise level along the roadway. Sensitive receptors were evaluated using the equivalent lane distance, which is the distance of the closest sensitive receptor along a roadway to the center of the nearest lane and the distance to the center of the farthest lane. As such, receptor distance and setback from the roadway are taken into account in the calculation of noise levels.

Comment 7 states that AM peak or mid-day traffic data should have been used for a baseline, rather than PM peak. The IS/MND mobile noise levels were calculated using information provided in the City-approved traffic study. The higher PM peak hour was utilized as the proposed project is an office project and higher traffic volumes are experienced when tenants and employees arrive and leave the workplace

and because the City-approved traffic study does not include any mid-day traffic projections. As demonstrated above and in Attachment A, utilization of AM peak data resulted in decreased impacts.

However, in order to add the most conservative approach in response to Comment 7, haul truck noise was reassessed using mid-day, off-peak hours and the newer TNM 2.5 Model. Midday off-peak traffic volumes were calculated using guidance provided by the L.A County Metro Regional Model and using AM peak hour traffic volumes as the baseline. In the Metro Regional Model, daily traffic is broken down such that peak hour traffic volumes are 10 percent of average daily traffic (ADT). Midday (9:00 a.m. to 3:00 p.m.) off-peak hour traffic volumes are considered to be 33 percent of ADT, or 5.5 percent of ADT for each off-peak hour. **Table 2** provides a breakdown of traffic volumes for Westlawn Avenue between Jefferson Boulevard and Beatrice Street. **Table 3** provides the breakdown of traffic volumes for Grosvenor Boulevard between Jefferson Boulevard and Beatrice Street.

TABLE 2: 8-HOUR TRAFFIC TRIP DISTRIBUTION WESTLAWN AVENUE

Traffic Period	Hour	Volume (trips)
AM Peak Hour	7:00 a.m. to 8:00 a.m.	282
AM Peak Hour	8:00 a.m. to 9:00 a.m.	282
Midday Off-Peak Hour	9:00 a.m. to 10:00 a.m.	155
Midday Off-Peak Hour	10:00 a.m. to 11:00 a.m.	155
Midday Off-Peak Hour	11:00 a.m. to 12:00 p.m.	155
Midday Off-Peak Hour	12:00 p.m. to 1:00 p.m.	155
Midday Off-Peak Hour	1:00 p.m. to 2:00 p.m.	155
Midday Off-Peak Hour	2:00 p.m. to 3:00 p.m.	155

SOURCE: TAHA, 2017.

TABLE 3: 8-HOUR TRAFFIC TRIP DISTRIBUTION GROSVENOR BOULEVARD

Traffic Period	Hour	Volume (trips)
AM Peak Hour	7:00 a.m. to 8:00 a.m.	804
AM Peak Hour	8:00 a.m. to 9:00 a.m.	804
Midday Off-Peak Hour	9:00 a.m. to 10:00 a.m.	442
Midday Off-Peak Hour	10:00 a.m. to 11:00 a.m.	442
Midday Off-Peak Hour	11:00 a.m. to 12:00 p.m.	442
Midday Off-Peak Hour	12:00 p.m. to 1:00 p.m.	442
Midday Off-Peak Hour	1:00 p.m. to 2:00 p.m.	442
Midday Off-Peak Hour	2:00 p.m. to 3:00 p.m.	442

SOURCE: TAHA, 2017.

Mid-day traffic, haul truck noise was assessed over an 8-hour period in order to accurately represent average perceived noise increases. The incremental increase was calculated assuming a baseline noise level over an 8-hour construction work day (7:00 a.m. to 3:00 p.m.). Total daily haul trucks (150 daily haul truck trips) and total daily delivery trucks (20 daily truck trips) were added over the baseline to calculate elevated noise levels resulting from project related construction trips. The resulting noise level increase for Westlawn Avenue between Jefferson Boulevard and Beatrice Street was 4.8 dBA 8-hour L_{eq} and the resulting increase for Grosvenor Boulevard between Jefferson Boulevard and Beatrice Street was 2.4 dBA 8-hour L_{eq}. This result is below the 5 dBA threshold and is consistent with the increases disclosed in the IS/MND.

COMMENT 8

Total Construction Noise Impact: Analysis fails to account for the cumulative impact of the project's on- and off-site construction-related noise levels at receptors.

The analysis failed to consider the cumulative noise impact of on-site construction activities and off-site construction vehicle travel on nearby receptors. For example, Table 3-9 shows that noise levels along Westlawn Avenue could increase by 3.6 dBA as a result of the project's haul trucks and other construction-related vehicles. A multi-family residence along Westlawn Avenue could experience this noise level increase. However, this receptor would also be simultaneously exposed to additional noises as a result of the project's on-site construction activities. If on-site construction noise would further elevate noise levels at this receptor by just 1.4 dBA or greater, then the receptor would experience a cumulative construction-related noise increase in excess of 5 dBA, the L.A. CEQA Thresholds Guide's noise increase threshold. And, as has been previously discussed, it is all but certain that the project's onsite construction noise alone would exceed this threshold, even without considering the addition of off-site noise from construction vehicles.

RESPONSE 8

As discussed in Response 1, above, the City utilizes the LAMC noise regulations as a threshold for construction noise for in-fill development in IS/MNDs rather than the 5 dBA CNEL incremental noise level cited in Comment 8. Therefore, the commenter is applying the wrong threshold standard to this comment analysis.

Also, refer to Response 5 related to noise levels from multiple pieces of equipment. LAMC noise regulations regulate the noise level of equipment, not off-site noises from construction vehicles. Noise levels from construction vehicles including haul trucks have been assessed separately and is further discussed in Response 7.

COMMENT 9

Operations Noise Impact: Outdated traffic model, incorrect receiver setback distances, and reliance on a P.M. peak hour traffic baseline understate the project's off-site operational noise impact.

The analysis modeled the project's off-site operational noise impact from its related vehicle travel by using the FHWA's RD-77-108 methodology. As discussed earlier, this method has been obsolete for nearly 20 years. TNM 2.5 is the FHWA's current traffic noise model, as well as the industry standard method of predicting traffic noise.

The study also predicted traffic noise levels at a distance of 50 feet from the right-of-way. Modeling noise levels at this distance underestimates the actual noise levels that would occur at receptors located much closer to these rights-of-way. For example, the multi-family residence along Westlawn Avenue is located at a setback of no more than 15 feet from that roadway's right-of-way. As a result, it would experience noise levels in excess of those projected to occur at a 50 feet distance.

Page 3-43 of the noise analysis claims that "the proposed project would generate 2,200 trips per day and this number was used as the baseline for off-site traffic noise impacts for the project." However, the analysis did not model the project's impact on daily CNEL noise levels. The off-site operational noise impact analysis relies on the use of a P.M. peak hour traffic baseline. Weighing the project's impacts against only this elevated period of traffic and related noise diminishes the project's incremental impact on noise off-site noise levels. During non-peak hours of travel, the project's impact on off-site noise levels would be more pronounced. For example, adding 50 vehicle trips to an existing 200 vehicle trips would result in a lower noise increase than adding only 40 trips to an existing 180 trips.

RESPONSE 9

Comment 9 states that an outdated traffic model and incorrect traffic volumes and receptor distances were applied to the operational traffic noise analysis. Please see Response 7, above, for a discussion of the use of the FHWA RD-77-108 model, the use of AM peak hour and midday traffic volumes, and receptor distances being adequately analyzed.

Furthermore, with regard to operational impacts, the PM peak is clearly the period of heaviest traffic. The majority of project trips are generated within the AM and PM peak hours, as the proposed project is an office project and higher traffic volumes are experienced when tenants and employees arrive and leave the workplace. As such, the AM and PM peak hours are the time periods the project would contribute the most trips and would have the most potential for impacts.

COMMENT 10

Operations Noise Impact: lack of an existing with project analysis prevents the project's individual mobile noise impact from being compared to an existing without project baseline.

Though the noise analysis does include an existing without project off-site operational noise baseline (albeit, a baseline limited to only the P.M. peak hour of traffic), it does not include existing with project noise levels. Existing with project analyses highlight a project's individual contribution to off-site noise increases in its vicinity. By comparing a future with project scenario to existing baseline conditions, the analysis does not compare the project's impact with existing conditions. An existing scenario should be directly compared with an existing with project scenario to disclose the project's individual off-site operational noise impact on existing noise levels (Sunnyvale West Neighborhood Assoc. v. City of Sunnyvale City Council).

RESPONSE 10

The Comment misrepresents the use of “baseline” in the noise analysis. The noise analysis for operational noise uses a baseline of existing noise conditions. The future noise impact of the project at build out considering all other traffic in the area at that time is compared to the existing condition baseline. Therefore, the IS/MND appropriately compares noise estimated to be generated by project-related traffic in the opening year against the existing condition/environmental baseline. The IS/MND concludes that the future with project compared to existing conditions on Westlawn Avenue (for example) would increase ambient noise levels by approximately 3.6 dBA CNEL, which is within the 5 dBA threshold for operational noise impacts. (IS/MND, p. 3-43 Table 3-10). The comment suggests that this is the incorrect baseline and that a comparison should be made with existing/baseline condition against the existing with project condition. However, the existing with project analysis assumes a project would be built instantly and would start generating trips and noise associated with traffic. This is an unrealistic scenario and does not provide useful information. The approach the IS/MND has taken is the appropriate approach to assess the effect of the Project on baseline existing conditions.

COMMENT 11

Construction Vibration Impact: Two vibration-sensitive studio receptors not identified/analyzed.

As discussed previously, ATN Stages and Vista Studios are two studio land uses that have not been identified by the analysis of the project's impacts. ATN Stages is located at 5415 Jandy Place, 80 feet west of the project. Vista Studios is located at 12615 Beatrice Street, 110 feet west of the project.

To analyze the project's potential construction-related vibration impacts on nearby studio land uses, the analysis cites the Federal Transit Administration's Traffic Noise and Vibration Assessment manual, which

establishes a 65 VdB significance criteria for TV and recording studios. In Table 3-14, the analysis shows the vibration levels of construction equipment that would operate at the project site. Caisson drills, large bulldozers, and hoe rams in particular are shown to be capable of producing groundborne vibration levels of 87 VdB at a reference distance of 25 feet.[7]

Using the same FTA vibration modeling methodology, these pieces of equipment would be projected to generate ground borne vibration levels of 71.8 VdB at ATN Stages and 67.7 VdB at Vista Studios. Both of these impacts would exceed the 65 VdB significance threshold for studios recommended by the FTA and adopted by the analysis.

7. Table 3-14 actually lists "Caisson Drill" twice, but it is fairly evident that one should read "Hoe Ram", as the vibration level of hoe rams are similar to caisson drills and are discussed on page 3-45.

RESPONSE 11

The comment references ATN Stages and Vista Studios, both of which are purported production studios. Although not explicitly listed in the Thresholds Guide, most noise and vibration assessment guidance documents, such as the FTA's Transit Noise and Vibration Impact Assessment Manual, do consider recording studios sensitive receptors. As such, the IS/MND analyzed 740 Sound Design and Digital Domain as potential sensitive receptors. The IS/MND concluded there would be no substantial vibration impacts to these identified private sound studio uses.

Regarding ATN Stages, this business was not identified during site visits to the project site prior to release of the IS/MND. Multiple online business records searches (ReferenceUSA, Google, Los Angeles Department of Building and Safety) completed on August 10, 2017 showed no business by this name at the referenced location. In addition, a site visit completed on August 10, 2017 to this address showed a vacant storefront with locked doors and no furniture. Multiple employees and businesses from the surrounding area were asked if they knew of ATN Stages, but no one had heard of the company. This business does not appear to exist.

Vista Studios opened for business on May 15, 2017 (Facebook Post: Vista Studios). The IS/MND was published prior to this date on April 17, 2017. The project was not listed as a related project in the relevant list provided by the City of Los Angeles, and the Applicant had no reasonable way to know this future use was planned. The environmental baseline was set on April 17, 2017 and no additional analysis is required regarding this land use. For informational purposes a discussion of vibration levels at Vista Studios is included below.

In its vibration analysis the IS/MND conservatively did not apply vibration attenuation associated with building foundations. The Vista Studios building is a large, one-story building, which is most likely constructed on spread footings. According to FTA Transit Noise and Vibration Impact Assessment guidance, a 13 dB reduction can be applied to ground-borne vibration (annoyance) for buildings that are large masonry constructed on spread footings, as the Vista Studios building appears to be. This would reduce the vibration level to 54.7 VdB at Vista Studios, which would be below the 65 VdB significance threshold.

COMMENT 12

Construction Vibration Impact: Vibration annoyance potential at nearby multi-family residence not analyzed.

As discussed above, the vibration analysis adopts the FTA's Traffic Noise and Vibrational Assessment manual threshold criteria for TV and recording studios experiencing disruptive groundborne vibration. In this same manual, though, the FTA also recommends threshold criteria for residences experiencing disruptive groundborne vibration. However, the study does not analyze the effects of disruptive and/or annoying ground borne vibration levels on residences in the vicinity of the project site, specifically the multi-family residences 50 feet south of the project.

According to the FTA, "infrequent" vibration events of 80 VdB or greater can be annoying to residences. "Occasional events" of at least 75 VdB or "frequent events" of at least 72 VdB would also be considered annoying to residences.[8] Construction activities would be considered a "frequent event," and would therefore trigger a vibration threshold of 72 VdB. Again, using the same FTA vibration modeling methodology, the project's caisson drill, large bulldozer, and hoe ram activities would be projected to generate vibration levels of up to 78.0 VdB at the aforementioned multi-family residences, exceeding both the FTA's "frequent events" and "occasional events" groundborne vibration thresholds for residential receptors.

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8. The FTA defines "frequent events" as more than 70 vibration events of the same source per day. "Occasional events" are defined as between 30 and 70 vibration events of the same source per day. "Infrequent event~" are defined as fewer than 30 vibration events of the some source per day.

RESPONSE 12

The City has not established a vibration annoyance standard in the LAMC or a related significance threshold in the LAMC. There is no statewide mandate to assess vibration annoyance from construction activities. Few, if any, jurisdictions assess vibration annoyance in the context of IS/MNDs for in-fill development, in part because vibration-generating activities in close proximity to existing uses is common in urban environments and does not produce significant harmful effects. The main concern with vibration is potential damage to buildings, which would not occur with the Project.

Ground-borne vibration would be generated primarily during site clearing and grading activities and by off-site haul-truck traveling on surface streets. As such, ground-borne vibration impacts are usually confined to short distances (i.e., 50 feet or less) from the source and are temporary and intermittent. Usually, ground-borne vibration decreases rapidly with distance. The nearest residential uses are located 50 feet from the Project Site. Construction activities immediately adjacent to the Project Site would produce vibration velocities that would not create potential residential building damage nor disturb sleep patterns, as all construction would only be allowed during hours specified by LAMC Section 41.40. Therefore, impacts would be less than significant.

Attachment A

TNM Haul Truck Analysis

<Organization?>	2 October 2017
<Analysis By?>	TNM 2.5

INPUT: ROADWAYS	Average pavement type shall be used unless
PROJECT/CONTRACT:	<Project Name?> a State highway agency substantiates the use
RUN:	<Run Title?> of a different type with the approval of FHWA

Roadway		Points					Flow Control			Segment	
Name	Width	Name	No.	Coordinates (pavement)			Control	Speed	Percent	Pvmt	On
				X	Y	Z	Device	Constraint	Vehicles	Type	Struct?
									Affected		
	ft			ft	ft	ft		mph	%		
Roadway1	40.0	point1	1	259.8	437.5	0.00				Average	
		point2	2	259.8	62.8	0.00					

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway1	point1	1	4090	25	85	25	85	25	0	0	0	0
	point2	2										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver1	1	1	294.8	267.0	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	With Barrier Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver1	1	1	0.0	70.0	66	70.0	10	Snd Lvl	70.0	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	1	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?>	2 October 2017
<Analysis By?>	TNM 2.5

INPUT: ROADWAYS	Average pavement type shall be used unless
PROJECT/CONTRACT:	<Project Name?> a State highway agency substantiates the use
RUN:	<Run Title?> of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway1	40.0	point1	1	259.8	437.5	0.00				Average	
		point2	2	259.8	62.8	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway1	point1	1	4094	25	105	25	238	25	0	0	0	0
	point2	2										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver1	1	1	294.8	267.0	0.00	4.92	70.00	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver1	1	1	70.0	72.4	66	2.4	10	Snd Lvl	72.4	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	1	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 3 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 3 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	1434	25	30	25	30	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

3 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
<Analysis By?>
3 October 2017
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	0.0	64.5	66	64.5	10	----	64.5	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?>	3 October 2017
<Analysis By?>	TNM 2.5

INPUT: ROADWAYS	Average pavement type shall be used unless
PROJECT/CONTRACT:	<Project Name?> a State highway agency substantiates the use
RUN:	<Run Title?> of a different type with the approval of FHWA

Roadway		Points					Flow Control			Segment	
Name	Width	Name	No.	Coordinates (pavement)			Control	Speed	Percent	Pvmt	On
				X	Y	Z	Device	Constraint	Vehicles	Type	Struct?
									Affected		
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 3 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points											
Name	Name	No.	Segment									
			Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	1438	25	50	25	180	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

3 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	64.50	66	10.0	8.0	Y

<Organization?>
3 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	64.5	69.3	66	4.8	10	Snd Lvl	69.3	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	1	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

TNM Mobile Noise Analysis

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	271	25	6	25	6	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
<Analysis By?>
2 October 2017
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	0.0	57.4	66	57.4	10	----	57.4	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Avg	Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	531	25	11	25	11	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	57.40	66	10.0	8.0	Y

<Organization?>
<Analysis By?>
2 October 2017
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	57.4	60.2	66	2.8	10	----	60.2	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	276	25	6	25	6	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Noise Reduction Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	0.0	57.5	66	57.5	10	----	57.5	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	531	25	11	25	11	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	57.50	66	10.0	8.0	Y

<Organization?>
<Analysis By?>
2 October 2017
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	57.5	60.2	66	2.7	10	----	60.2	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	472	25	10	25	10	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	0.0	59.7	66	59.7	10	----	59.7	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	1084	25	23	25	23	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	59.70	66	10.0	8.0	Y

<Organization?>
<Analysis By?>
2 October 2017
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Noise Reduction Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	59.7	63.3	66	3.6	10	----	63.3	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?>					2 October 2017						
<Analysis By?>					TNM 2.5						
INPUT: ROADWAYS							Average pavement type shall be used unless				
PROJECT/CONTRACT:	<Project Name?>						a State highway agency substantiates the use				
RUN:	<Run Title?>						of a different type with the approval of FHWA				
Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	843	25	18	25	18	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	0.00	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	Noise Reduction Calculated	Noise Reduction Goal	Noise Reduction Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	0.0	62.3	66	62.3	10	----	62.3	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: ROADWAYS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with the approval of FHWA

Roadway		Points									
Name	Width	Name	No.	Coordinates (pavement)			Flow Control			Segment	
				X	Y	Z	Control Device	Speed Constraint	Percent Vehicles Affected	Pvmt Type	On Struct?
	ft			ft	ft	ft		mph	%		
Roadway6	51.0	point6	6	256.6	392.9	0.00				Average	
		point8	8	256.6	113.7	0.00					

<Organization?> 2 October 2017
<Analysis By?> TNM 2.5

INPUT: TRAFFIC FOR LAeq1h Volumes
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Roadway	Points		Segment									
Name	Name	No.	Autos		MTrucks		HTrucks		Buses		Motorcycles	
			V	S	V	S	V	S	V	S	V	S
			veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph	veh/hr	mph
Roadway6	point6	6	1084	25	23	25	23	25	0	0	0	0
	point8	8										

<Organization?>
<Analysis By?>

2 October 2017
TNM 2.5

INPUT: RECEIVERS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>

Receiver Name	No.	#DUs	Coordinates (ground) X	Y	Z	Height above Ground	Input Sound Levels and Criteria: Existing LAeq1h	Impact Criteria LAeq1h	Impact Criteria Sub'l	NR Goal	Active in Calc.
			ft	ft	ft	ft	dBA	dBA	dB	dB	
Receiver10	10	1	216.6	255.3	0.00	4.92	62.30	66	10.0	8.0	Y

<Organization?>
2 October 2017
<Analysis By?>
TNM 2.5
Calculated with TNM 2.5

RESULTS: SOUND LEVELS
PROJECT/CONTRACT: <Project Name?>
RUN: <Run Title?>
BARRIER DESIGN: INPUT HEIGHTS
ATMOSPHERICS: 68 deg F, 50% RH

Average pavement type shall be used unless a State highway agency substantiates the use of a different type with approval of FHWA.

Receiver Name	No.	#DUs	Existing LAeq1h	No Barrier LAeq1h Calculated	Crit'n	Increase over existing Calculated	Increase over existing Crit'n Sub'l Inc	Type Impact	With Barrier Calculated LAeq1h	With Barrier Noise Reduction Calculated	Noise Reduction Goal	Calculated minus Goal
			dBA	dBA	dBA	dB	dB		dBA	dB	dB	dB
Receiver10	10	1	62.3	63.3	66	1.0	10	----	63.3	0.0	8	-8.0

Dwelling Units	# DUs	Noise Reduction Min	Noise Reduction Avg	Noise Reduction Max
		dB	dB	dB
All Selected	1	0.0	0.0	0.0
All Impacted	0	0.0	0.0	0.0
All that meet NR Goal	0	0.0	0.0	0.0

ATTACHMENT C

Minor Corrections To Planning Commission Adopted Findings

Technical Corrections to City Planning Commission Findings
Case No. CPC-2016-1208-CU-SPR
Council File 17-1041

(Changes shown in **bold**, strikeout and underlined.)

Findings

Page F-10; Paragraph 5

"5. The project complies with the height and area regulations of the zone in which it is located.

The M2-1 zoning of the project site permits a by-right floor area ratio of 1.5:1. For a project site totaling 196,447 square feet, this ratio permits a total floor area of 294,671 square feet. The project's proposed floor area totaling 269,277 square feet, (69,777 square feet for the existing building and 199,500 square feet for the proposed new building. The proposed floor area ratio is approximately 1.46:1, which is less than the allowable 1.5:1 ratio permitted by the M2-1 Zone. As conditioned, the height of the proposed new building varies from 30 feet to ~~**125**~~ **135** feet in height, with an additional maximum 20-foot tall rooftop penthouse intended for the housing of mechanical equipment only. While the site's zoning does not limit the height of the proposed project, the site located within an Airport Hazard area, which is an area designated as an airport hazard area whose boundaries impose height limitations on the use of the land. Airport Hazard means any structure or tree or use of land which obstructs the airspace required for the flight of aircraft in landing or taking off at an airport or is otherwise hazardous to the landing or taking off of an aircraft. Specifically, the applicable Airport Hazard limits the height of the subject site to 200 feet. The proposed project is consistent with this limitation."

Note: This correction is intended to accurately state the maximum height of the project, which is 135 feet.

Page F-17, Height, Bulk and Setbacks First Paragraph

"Height, Bulk and Setbacks

The M2-1 zoning of the project site permits a by-right floor area ratio of 1.5:1. For a project site totaling 196,447 square feet, this ratio permits a total floor area of 294,671 square feet. The project's proposed floor area totaling 269,277 square feet, (69,777 square feet for the existing building and 199,500 square feet for the proposed new building. The proposed floor area ratio is approximately 1.46:1, which is less than the allowable 1.5:1 ratio permitted by the M2-1 Zone. As

conditioned, the height of the proposed new building varies from 30 feet to ~~**125**~~ **135** feet in height, with an additional maximum 20-foot tall rooftop penthouse intended for the housing of mechanical equipment only. While the site's zoning does not limit the height of the proposed project, the site located within an Airport Hazard area, which is an area designated as an airport hazard area whose boundaries impose height limitations on the use of the land. Airport Hazard means any structure or tree or use of land which obstructs the airspace required for the flight of aircraft in landing or taking off at an airport or is otherwise hazardous to the landing or taking off of an aircraft. Specifically, the applicable Airport Hazard limits the height of the subject site to 200 feet. The proposed project is consistent with this limitation. Surrounding properties in the vicinity that are zoned M2-1 have the same development potential of the proposed project and, if sought, would be permitted the construction of building with a floor area ratio of 1.5:1 and a height limitation only required pursuant to the Airport Hazard limits."

Note: This correction is intended to accurately state the maximum height of the project, which is 135 feet.

Page F-18, Paragraph 3

"Off-Street Parking Facilities

The project is required a minimum of 586 automobile parking spaces, but has been designed to provide a total of 845 parking spaces. The project is also required a minimum of 60 bicycle parking spaces, including 40 long-term and 20 short-term spaces. All automobile and long-term bike parking would be located on-site, out of the public right-of way.

Driveways on Beatrice Street and Jandy Place will provide access to parking. Truck deliveries would be routed along Jandy Place to the building's northeast corner. In response to concerns from neighboring uses of the immediate area, the project was modified to reduce its height and reconfigure its driveway circulation plan to reduce impacts on surrounding uses. Three existing driveways serving the site of the proposed building along Beatrice Street will be replaced with two driveways serving the parking levels of the new structure. Two additional driveways along Jandy Place will be added to additionally serve the parking levels of the proposed building. In addition, an existing driveway located at the north end of the Jandy Place cul-de-sac will be modified to allow for access to a new loading and trash collection area that is located on-site and out of the public right-of-way. The proposed driveway plan has been designed to ensure that the vehicles are able to easily access on-site parking and to ensure that vehicular traffic does not disproportionately affect one street frontage over the other.

With respect to parking, the project has been conditioned to **require that all above-grade parking be fully integrated into the building design.** ~~**limit the**~~

~~**number of parking levels to 2.5, rather than the 3.5 that it proposes.**~~ In consideration of comments received during review of the project's design and from business and residential neighbors of the project site, in addition to the City Planning Commission's active policy pertaining to above-grade parking structures, the project has been conditioned to screen parking **utilizing extensive glazing** and provide a green wall. ~~**In further response to the project's surplus parking provided in excess of the Los Angeles Municipal Code, staff has recommended that one level of above grade parking be removed from the project. The removal of parking located on level L4 will result in a reduction of 177 parking spaces, resulting in overall parking count of 668 spaces, which is 82 more parking spaces than required by Code. This reduction in parking will service to reduce the size of the project's parking podium, resulting in a further integration of the parking podium into the building. By removing parking located on level L4, there is an opportunity for the remaining 400 square feet of general retail space on this level to be shifted to L3, making the ancillary commercial uses more accessible to the public. As a further result, the removal of one level of parking will reduce the overall size of the project, which has been a consistent request heard from public comments.**~~

Therefore, the off-street parking facilities will be compatible with the existing and future developments in the neighborhood."

Note: This correction is intended to accurately reflect the project's parking count and design, as approved by the City Planning Commission.