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VIA EMAIL and PERSONAL DELIVERY

Los Angeles City Council
Planning and Land Use Management Committee
200 North Spring Street
Los Angeles, CA 90012

Re: CPC-2016-1208-CU-SPR/ENV-2016-1209-MND
12575 Beatrice Street (12553-12575 West Beatrice Street; 5410-5454 S. Jandy Place)

Honorable Councilmembers:

Our law firm represents Karney Management Company, the manager and owners' representative of the parcels located immediately to the west and south of the proposed construction of a new **155-foot**[1] high office building and associated parking, landscaping, and hardscape at 12553–2575 West Beatrice Street; 5410–5454 S. Jandy Place ("the Project"). Our clients and their tenants will be the most impacted, both directly and negatively, if the Project, as proposed, is approved.

For all of the reasons forth hereinbelow, including that the legally mandated findings for the Project, as proposed, cannot be made with substantial supporting evidence and the Mitigated Negative Declaration ("MND") for the Project is inadequate as a matter of law under the California Environmental Quality Act ("CEQA"), the Council should grant the within appeal.

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[1] The Applicant has attempted to disguise the true height of this Project by asserting that it is 135 feet. This height calculation, however, does not include the 20 foot high and large mechanical room (the equivalent of *two* additional stories!) *on top* of the 135 foot building.

I. The Project is Limited to a 45-foot Height Limit

First and foremost, the Council Office should be aware that while the Applicant has applied for a lot line adjustment to create an approximately 20 x 20, 317 square foot "lot" adjacent to Beatrice Street on which no structure will be built, as of today, **no such lot line adjustment has been approved**. Accordingly, the Project is proceeding on a M2-1 Zoned site, situated directly across Beatrice Street from the Avalon Playa Vista residential apartments and is therefore a "Commercial Corner" under LAMC § 12.03. Under the Commercial Corner regulations, **development thereon is therefore limited to a height of 45 feet**. See *Los Angeles Municipal Code* ("LAMC") § 12.22.A.23.

What's more, the lot line adjustment requested by the Applicant cannot be approved because it would be **illegal under the Subdivision Map Act.** The Subdivision Map Act limits lot line adjustments to those existing between ***four or fewer*** existing adjoining parcels. See *Government Code* §66412(d). Here, the Applicant's request is to adjust a line within ***five*** contiguous lots. Accordingly, it cannot be legally granted.

And, in any case, even if it could legally be granted, the lot line adjustment is of no use to the Applicant. Again, as proposed, the lot line adjustment is to create an approximately 317 square foot "lot" adjacent to Beatrice Street on which no structure will be built. [2] The Applicant believes that if such a "lot" is created, the "Commercial Corner" restrictions will not apply to this Project.

The Applicant is wrong. The Project is not limited to just those lots on which physical buildings will be located. The Project's siting encompasses the ***whole*** of the M2-1 Zoned site which is the subject of the within action.[3] The Applicant admits as much in its application and proposed findings, providing the location of the Project as *the total area* of all of the lots and expressly

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[2] There is no process in the Subdivision Map Act, the LAMC, or any other law to create a parcel upon which no legal structure could ever be constructed and which could never be used for any legal purpose. The creation of this sliver of land subverts not just the intent of the "Commercial Corner" Ordinance, but also the Subdivision Map Act pursuant to which the LAMC sections relating to the division of land are prescribed.

[3] Indeed, such unscrupulous actions by developers are precisely what the "four or fewer" lot limitation in the Subdivision Map Act is intended to protect against.

acknowledging that the 317 square foot "lot" created by the lot line adjustment will be created in connection with the Project's landscaping and open space purposes.[4]

Simply put, the whole of the Project site is a "Commercial Corner" under the LAMC. Therefore, *all* proposed structures that exceed 45 feet, including the massive 155 foot structure, are illegal under LAMC §12.22.A.23. This City Council should not allow an applicant to subvert and circumvent the protections of the City's Ordinances, such as the Commercial Corner Ordinance, by creating these types of land "slivers" and calling them "lots" simply to avoid zoning restrictions.

II. The Withdrawal of Floor Area Averaging under LAMC §12.24.W.19 was in Error and the Project Exceeds the Maximum Permitted FAR

The Applicant claims that revision of the Project (it was originally proposed at 323,923 square feet) eliminated the need for Floor Area Averaging under LAMC §12.24.W.19. Again the Applicant is wrong. The proposed Project continues to propose a 199,500 square foot building on the 12575 Beatrice Street lot which will be expanded to 103,353 square feet with the lot line adjustment. Accordingly, as to that lot, the FAR will be 1.93, which exceeds the allowable 1.5:1 FAR limit. Without Floor Area Averaging, there is no legal way to build the Project, as proposed.[5]

III. The Project Violates LAMC §12.36

LAMC §12.36.B requires applicants to file all applications for all approvals reasonably related to complete the project at the same time. LAMC §12.36.A provides that it is applicable to any legislative approval that requires any legislative, quasi-judicial or subdivision approval.

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[4] Since we have raised this argument, the Applicant and the City have changed their position that the 317 lot will no longer be a part of the Project site. This is in complete contradiction to all of the application documents, and is simply untrue. The lot line adjustment is *necessary* to accomplish the Project, as proposed by the Applicant, and all of the lots are considered (including by the Applicant and the City) a "unified development."

[5] No lot ties are being proposed by the application.

Here, it is clear that in addition to the entitlements proposed, the Project will also need at least a Condition Use Permit for beer and wine (probably a Master Conditional Use) to operate the anticipated bar and restaurant use; a haul route[6]; a lot tie; the approval of the aforementioned lot line adjustment; and, per the Project's own MND, "additional actions as determined necessary."

Without clear information about all approvals reasonably related to complete this Project, the City cannot continue to process the Project under LAMC §12.36.

IV. The Required Findings for a Major Development Project under LAMC §12.24.U.14 Cannot be Made with Substantial Supporting Evidence

a. The Project *does not* provide for an arrangement of uses, buildings, structures, open spaces and other improvements that are *compatible with the scale and character of the adjacent properties* and surrounding neighborhood;

The prevailing scale and character of the adjacent properties and surrounding neighborhood surrounding the Project is that of low-height, creative office uses. The majority of the surrounding uses are buildings which are one (1) to (3) three stories in height, and ***all* adjacent properties are single story industrial buildings** [*Exhibit 1*].

The Project will overwhelm and overshadow these low-height, creative office buildings. Indeed, at 155 feet, the Project will introduce a height otherwise unknown in this entire neighborhood. It will be ***five* times higher than *all* adjacent buildings and nearly *two* times higher than even the highest building along Jefferson** [*Exhibits 1, 2*].

The Applicant's proposed findings make absolutely no effort to show how the Project will be compatible with the predominantly single-story, creative office scale and character of the adjacent properties and surrounding neighborhood. Instead, the proposed findings generally describe how the building mass is "varied" and the Project will provide setbacks and landscaping. But what does that have to do with whether the Project is *compatible* with the *scale and character* of the adjacent properties and surrounding neighborhood? Nothing. The

[6] No haul route application for this Project can be found in the City's files.

Applicant is providing a "smoke and mirrors" approach, hoping that the Council focuses its attention on Project details rather than the plain language of the finding that it needs to make.

There is *no* evidence, let alone substantial evidence, to support the finding that the Project will be *compatible* with the *scale and character* of the *adjacent properties* and surrounding neighborhood. The only evidence is to the contrary. For this reason alone, the Project must be denied.

b. The Project is *not* consistent with the City Planning Commission's Design Guidelines for either Commercial or Industrial Projects.

In 2013, the City Planning Commission adopted the Citywide Design Guidelines ("Guidelines") to serve as the City's vision for the future and to provide guidance and best practices for new development, encouraging projects to complement existing urban form in order to enhance the built environment of the City Los Angeles.[7]

As it relates to Commercial projects, the Guidelines provide the following applicable goals and objectives:

1. *Consider neighborhood context* and linkages in building and site design (objective 1, p. 8);

2. *Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood.* In older neighborhoods, new developments should likewise respect the character of existing buildings with regards to height, scale, style, and architectural materials (relationship to adjacent buildings, objective 1, p. 15);

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[7] The City of Los Angeles' General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence in buildings, landscape, open space, and public space. **They also stipulate that *preservation of* the City's *character and scale*, including its traditional urban design form, shall be *emphasized* in consideration of future development**. To this end, the Citywide Design Guidelines have been created to carry out the common design objectives that maintain neighborhood form and character while promoting design excellence and creative infill development solutions.

3. *Minimize the appearance* of driveways and *parking areas*. Where alternatives to surface parking are not feasible, locate parking lots at the interior of the block, rather than at corner locations. Reserve corner locations for buildings (objective 4, p. 34).

As it relates to Industrial projects, the Guidelines similarly provide the following applicable goals and objectives:

1. *Consider neighborhood context and compatible design of uses* (objective 1, p. 8);

2. *Ensure that new buildings are compatible in scale, massing, style, and/or architectural materials with existing structures in the surrounding neighborhood*. In older neighborhoods, new developments should likewise respect the character of existing buildings with regards to height, scale, style, and architectural materials (relationship to adjacent buildings, objective 1, p. 13)

3. *Facilitate safe access for loading areas* while buffering pedestrians and non-industrial uses (objective 4, p. 29).

In sum, the Guidelines promote one main goal: development that is *compatible* with *adjacent* and surrounding properties.

The within Project's mass, scale, and height, as well as location immediately abutting low-rise, predominantly single story industrial and creative office structures puts it at odds with all of these land use purposes and objectives. The Project completely ignores the neighborhood context, failing to provide *any* sense of compatibility in scale or massing to the adjacent buildings surrounding it. Instead of minimizing the appearance of parking areas, it puts above-grade parking *immediately* adjacent to the front door of 5404 Jandy Place. Instead of facilitating safe access for loading areas, it proposes half of its ingress/egress along Jandy Place, a 400-foot long cul-de-sac street which is already congested most of the day. This Council should be aware that Jandy Place serves as the only access to several buildings, including at 5404 Jandy Place and 12615 Beatrice Street, both of which are past the choke point created by the Project.

Accordingly, the Project is *not* consistent with the City Planning Commission's design guidelines for Commercial or Industrial projects, and any finding to the contrary would be lacking in substantial evidence.

V. The Required Findings for Site Plan Review under LAMC §16.05 Cannot be Made with Substantial Supporting Evidence

a. The Project is *not* in substantial conformance with the purposes, intent and provisions of the General Plan and the Palms-Mar Vista-Del Rey Community Plan;

As set forth above, the Project is inconsistent with the City Planning Commission's design guidelines for both Commercial and Industrial projects, a part of the City's General Plan Framework Element. The Project is also inconsistent with the following Palms-Mar Vista-Del Rey Community Plan goals and purposes:

1. *Require* that commercial projects[8] be designed and developed to achieve a high level of quality, distinctive character and *compatibility with surrounding uses and development* (policy 2-1.4, p. III-5).

2. *Require that the design of new development be compatible with adjacent development, community character and scale* (policy 2-3.1, p. III-6).

3. To provide a viable industrial base with job opportunities for residents *with minimal environmental and visual impacts to the community* (objective 3-1, p. III-6).

4. *Ensure compatibility* between industrial and other adjoining land uses through design treatments, compliance with environmental protection standards and health and safety requirements (policy 3-1.2, p. III-7).

5. Provide parking in appropriate locations in accordance with Citywide standards and community needs (objective 13-1, p. III-19).

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[8] Notably, the Community Plan specifically provides that Commercial land use in the Palms-Mar Vista-Del Rey Community Plan area is **primarily small-scale and neighborhood-oriented** (p. III-4).

6. Ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure (objective 16-2, p. III-24).

As with the Design Guidelines, the Community Plan focuses on a primary goal for development that is *compatible* with adjacent and surrounding properties. But, as already discussed, the Project makes absolutely no effort to provide for compatibility with its adjacent, predominantly single story industrial neighbors. Its height, scale and inappropriate location of above ground parking immediately abutting other low rise uses will cause visual blight, toxic emissions, odors, and noise.

In contravention of Palms-Mar Vista-Del Rey Community Plan objective 3-1, p. III-6, the Project even fails to provide for an EIR to analyze the environmental impacts it will inevitably cast.

Instead of analyzing the Project against the Palms-Mar Vista-Del Rey Community Plan, the Applicant's proposed findings purport to nothing more than general descriptions of Project elements, without regard for whether such elements are in fact consistent with and satisfy the Community Plan requirements. But the Courts have been clear that findings of "consistency" with land use plans require more than simple incantation. The City cannot just articulate a policy in a land use plan and then approve a conflicting project. *Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777.

b. The Project does *not* consist of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be *compatible* with existing and future development on adjacent properties and neighboring properties.

In addition to all of the aesthetic, height, scale, and mass incompatibilities discussed above (which alone show that this finding cannot be made), the Project's proposed traffic/parking design is at complete odds with the buildings surrounding it. The Project proposes half of its ingress/egress along Jandy Place, a 400-foot long cul-de-sac street which is already congested most of the day. Jandy Place already serves as the only access to several buildings, including at 5404 Jandy Place and 12615 Beatrice Street. If the Project is constructed, Beatrice Street, which is also a congested cul-de-sac, would experience enormous spill-

over, severely and negatively impacting adjacent uses' ability to access their businesses. Indeed, as set forth hereinbelow, the Project will create a substantially increased hazard at the intersection of Jandy and Beatrice, a condition that is neither addressed nor mitigated in the MND.

VI. The Mitigated Negative Declaration is Inadequate under CEQA.

The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language. *Friends of Mammoth v. Bd. of Supervisors* (1972) 8 Cal.3d 247, 259.

The heart of CEQA is the Environmental Impact Report ("EIR"). *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1214. Accordingly, a public agency must prepare an EIR whenever substantial evidence supports a fair argument that a proposed project may have a significant effect on the environment. The fair argument standard is a "low threshold" test, and public controversy concerning environmental effect of a project indicates that preparation of an EIR is desirable. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

CEQA requires **strict compliance** with the procedures and mandates of the statute. *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118.

For all of the reasons set forth below, and as set forth in more detail in the independent review by CAJA Environmental Services, LLC, Douglas Kim and Associates, Kimley-Horn and Associates, Inc., and Coco Traffic Planners, Inc. [*Exhibits 3, 4, 5 and 6*], the CEQA procedures and mandates have not been met. Substantial evidence supports a fair argument that the Project may have a significant effect on the environment, and an EIR must be prepared.

a. The MND is Premature and Defers Environmental Review

A fatal flaw in the proposed MND is that it fails to integrate its analysis with all of the planning and environmental review procedures required under the Los Angeles Municipal Code. Instead it provides that the certain aspects of the Project, including a haul route, off-site improvements in the adjacent rights-of-way, a lot line adjustment and "additional actions as may be determined

necessary" will be evaluated at some later date. This is plainly against the CEQA requirements.

CEQA sets out a fundamental policy requiring local agencies to integrate the requirements of CEQA with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively. Public Resources Code § 21003(a); *See also CEQA Guidelines* § 15080 (to the extent possible, the CEQA process should be combined with the existing planning, review, and project approval process used by each public agency). It is for that reason that CEQA requires all environmental assessment/analysis, including formulation of mitigation measures to mitigate potential environmental impacts, to occur before a Project is approved. *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906. By refusing to integrate the evaluation of other actions necessary to complete the Project, the City is ignoring these CEQA obligations, constituting clear error and abuse on its part. *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645, 652.

b. The MND Fails to Provide Consistent and Accurate Information

On numerous occasions, specific Project information in the MND does not match what is proposed on the accompanying figures within the MND and which are supposed to serve as the substantial evidence that supports the conclusions in the MND. [*See Exhibit 3*].

All of this information needs to be corrected and reassessed to comply with CEQA. *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645 (where an agency fails to abide the informational requirements of CEQA by omitting material necessary to informed decisionmaking and informed public participation, harmless error analysis is inapplicable and the agency is deemed to have erred and abused its discretion).

c. Project Description

Knowledge of the regional setting is critical to the assessment of environmental impacts. Accordingly, an accurate description of the physical environmental conditions in the vicinity of the project is critical for a proper evaluation of the potential environmental effects of a proposed activity. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.

Here, the MND completely fails to provide an adequate environmental setting discussion, including other related projects (also necessary for a cumulative impact analysis, discussed below), the fact that the Project is located on a Methane Hazard site, and the schools to the north and east of the Project site (necessary to adequately provide an assessment of the Project in relation to its surrounding uses). Without this information, it is impossible to adequately evaluate the potential environmental effects of the Project.

d. Aesthetics

The proposed Project will degrade the existing visual character or quality of the Project site and its surroundings. **It will introduce a height otherwise unknown in this area, overshadowing adjacent uses.**[9] Even worse, the MND attempts to mask the full height of the Project by claiming the Project maximum height is 135 feet, when there is actually a 20 foot high and large mechanical room *on top* of the 135 foot structure – that room equivalent to *two additional stories*. Similarly, it will create a monotonous view of nothing more than parking garage spaces for adjacent buildings, all of which are two to three stories in height (either the same height as or lower than the above ground parking garage). [*See Exhibits 1, 2*]. The MND's aesthetic "analysis" completely fails to analyze any of these factors. Indeed, it provides that there will be a "less than significant impact" on the visual character of the site and its surroundings without providing any detail about what such "character" is comprised of. The MND fails to discuss *any* height, color or façade compatibility, all of which are necessary to adequately evaluate the aesthetic impacts of this Project on its surroundings.

e. Air Quality

The Air Quality analysis in the MND is based upon an old, 2012 Air Quality Management Plan (AQMP). This AQMP has been superseded by a 2016 version. The whole of the Air Quality analysis needs to be re-reviewed and analyzed under the relevant 2016 AQMP.

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[9] *See* Exhibit 3, the MND fails to mention that there exists an outdoor gathering space directly north of the Project which is considered a "shadow-sensitive" use under the *L.A. CEQA Thresholds Guide*. The impacts on "shadow-sensitive" uses must be evaluated under the City's own Thresholds Guide.

What's more, the MND admits that the proposed growth in population from the Project could exceed the 2020 projections for the City in the adopted 2012 AQMP. If this is the case under the 2016 standards, the Project would conflict and obstruct implementation of the applicable, federally-approved air quality attainment plan for the region and must be fully evaluated and disclosed in an EIR.

The MND also fails to provide for the impacts on air quality caused by the Project being in a Methane Hazard Zone and provides inconsistent information about the anticipated motor vehicle emissions which will result (the MND provides that the average daily weekday traffic associated with the proposed project is estimated to be 2,200 vehicle trips; the CalEEMod analysis identifies 2,758 daily vehicle trips; while the LL&G traffic study identifies 1,946 daily trips).

Finally, the MND fails to conduct a Health Risk Assessment (HRA) to assess potential construction impacts to neighboring schools and nearby residential sensitive receptors, including the residential receptors just 50 feet to the south which will be directly next to one of the proposed truck routes (trucks are a known source of carcinogens).

In order to comply with CEQA, including for all of the reasons set forth in Exhibit 3, the whole of the "Air Quality" analysis needs to be re-reviewed and re-analyzed.

f. Cultural Resources

As disclosed and admitted by the City in the environmental reports completed for the surrounding Playa Vista residential developments, and other recent developments in the surrounding area, there is high potential that the Project will disturb and/or destroy paleontological resources. Inconsistent with these development projects and the environmental reports completed in connection therewith, the within Project MND fails to adequately evaluate these impacts. [*Exhibit 3*]. This is a blatant CEQA violation.

g. Geology and Soils

The MND admits that the Project would expose people and structures to seismic-related ground failure, including liquefaction, and that the Project site is located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and has potential to result in on-or off-site landslide,

lateral spreading, subsidence, liquefaction, or collapse. In response, it finds that the implementation of Mitigation Measure GEO-1 would reduce impacts to a less than significant level.

But Mitigation Measure GEO-1 is nothing more than structural *recommendation*. A "recommendation" is not a "mitigation measure." CEQA requires that mitigation measures be both feasible and "fully enforceable." *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal.App.4th 425 (the purpose of monitoring and reporting requirements for enforcement of mitigation measures is to ensure that a feasible mitigation measure will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded); *CEQA Guidelines*, § 15126.4 (a)(2) (mitigation measures must be "fully enforceable").

In order to adequately mitigate for the potential seismic-related ground failure, including liquefaction, the MND must provide fully enforceable mitigation measure.

Similarly, the MND analyzes excavation up to twenty feet, the exact same number as what would be required for the proposed two-levels of underground parking. This amount of grading is impossible because it does not consider the structural elements that will need to support the two levels of underground parking. The true grading amounts must be set forth so that their environmental impacts could be evaluated as required by CEQA.

h. Greenhouse Gas Emissions

The MND does not adequately identify or discuss 2030 and 2050 GHG targets, codified by SB 32 and fails to provide substantial, if any, evidence that the Project will further the state's GHG reduction targets.

What's more, while the MND mentions the SCAQMD CEQA Threshold Working Group's GHG threshold, it fails to note that the Project exceeds this threshold.

i. Hazards and Hazardous Materials

In evaluating the impacts of the Project with regard to hazards and hazardous materials, the MND completely fails to identify, analyze or evaluate

the fact that the Project is located in both a Methane Hazard Zone and an Airport Hazard Zone.

According to the City Ordinance regulating methane, methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation.

Relying narrowly on the thresholds, the MND also finds that there are no impacts at all with respect to airport or methane related impacts. However, whether or not a particular environmental effect meets a particular threshold cannot be used as an automatic determinant that the effect is or is not significant, and the use of the Guidelines' thresholds does not necessarily equate to compliance with CEQA. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09. Once identified, all environmental impacts must be evaluated and mitigated; they cannot be ignored. *Woodward Park Homeowners' Association v. City of Fresno* (2007) 150 Cal.App.4th 683, 728 (an agency cannot acknowledge an impact and approve the project after imposing a mitigation measure not shown to be adequate by substantial evidence). Here, in order to adequately analyze hazards and hazardous material impacts, the MND must address impacts associated with the Project's location in an Airport Hazard and Methane Hazard Zone, as designated by the City itself.

j. Land Use and Planning

The MND's land use and planning section is woefully deficient. First and foremost, it only evaluates the Project's consistency with the Palms—Mar Vista—Del Rey Community Plan. But that is not all that CEQA requires. CEQA requires an analysis of whether the Project conflicts with *any* applicable land use plan, policy or regulation. This includes the applicable Do Real Planning Guidelines, Citywide Design Guidelines, the Southern California Association of Governments ("SCAG") Regional Plan (including SCAG's Regional Transportation Plan and Compass Growth Visioning effort), the South Coast Air Quality Management District Air Quality Management Plan, the Los Angeles County Metropolitan Transportation Authority Congestion Management Program ("CMP"), and the Los Angeles Municipal Code. Consistently with all of these land use plans must be adequately reviewed and evaluated in order to comply with CEQA. [*See also, Exhibit 3*].

Furthermore, the Project is **inconsistent** with the City's Design Guidelines and the Palms—Mar Vista—Del Rey Community Plan for all of the reasons

discussed hereinabove. In order to be legally adequate under CEQA, an MND cannot selectively pick and choose policies with which it deems a project to be consistent, but must identify and discuss all noted **inconsistencies**. *CEQA Guidelines* §15125(d); *L.A. CEQA Thresholds Guide*[10].

An MND also cannot, as it purports to do here, simply list land use policies, and then without any substantial evidence to support, summarily find "consistency." Consistency requires more than incantation. The City cannot simply articulate a policy in its land use plan and then approve a conflicting project. *Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 181 (setting aside EIR based upon findings that no reasonable person could have made the consistency finding on the record before it). The City must support its findings of consistency with substantial evidence of consistent Floor Area Ratio's, density, parking requirements, open space, etc. Otherwise, the consistency findings are not supported by substantial evidence.

k. Noise

The MND utterly fails to address the fact that there are sensitive receptors that will be significantly impacted from construction noise including the underestimated volume of excavation and the operation of a large parking facility, the loading area and mobile noise from all of the likely vehicles that will have to turn around at the end of the cul-de-sac.

Moreover, the MND, while referencing the thresholds for noise impacts (a 5 dBA increase above existing ambient noise levels), fails to apply this threshold for construction noise. To analyze construction noise, the MND instead looks at the LAMC noise standards for construction equipment. When the correct standard is used (see table 3-8 in the MND), it is clear that construction noise far exceeds the allowable 5 dBA threshold, resulting in a 27 dBA increase over

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[10] The L.A. CEQA Threshold Guide with respect to "land use consistency" states: The determination of significance shall be made on a case-by-case basis, considering:

- Whether the proposal is **inconsistent** with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is **inconsistent** with the General Plan or adopted environmental goals or policies contained in other applicable plans.

existing ambient noise conditions, causing a significant impact that must be mitigated. [*See Exhibits* 3, 4]

To make matters worse, the MND proposes an utterly deficient mitigation measure to address construction noise - Noise XII-27. But a "complaint line" mitigates absolutely no impact, it simply provides for a way to complain about an impact after it occurs. As such it is inadequate under CEQA, which requires that mitigation measures be feasible, enforceable and capable of mitigating the impact for which they are imposed. *Lincoln Place Tenants Ass'n v. City of Los Angeles* (2007) 155 Cal.App.4th 425; *CEQA Guidelines*, § 15126.4 (a)(2); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70; *CEQA Guidelines, §15126.4(a)(4)(A); Nollan v. California Coastal Commission*, 483 U.S. 825 (1987).

A comprehensive analysis of errors in the Project's MND with regard to its noise analysis, including its failure to (1) analyze noise impacts to two studio receptors; (2) analyze noise impacts from concrete mixing and pumping activities and off-site improvements in adjacent rights-of-way; (3) show that analyzed impacts are less than significant; (4) disclose potential significant health impacts; (5) use correct modeling and baselines; (6) analyze vibration impacts; and (7) provide adequate mitigation measures is attached hereto as Exhibit 4.

l. Transportation/Traffic

The MND finds that there is less than significant impact based on possible conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. This conclusion is completely devoid of supporting substantial evidence. Indeed, the MND fails, at all, to review and analyze consistency with all applicable traffic/transportation plans, including SCAG's Regional Transportation Plan. Accordingly, it is in error.

Furthermore, the MND finds that the Project does not substantially increase hazards due to a design feature or incompatible uses. This is blatant error. Indeed, although it has numerous options along Beatrice Street and Grosvenor Boulevard, the Project is designed to provide ***50% of its traffic on Jandy Place, an approximately 400-foot in length cul-de-sac street***, which

provides ingress/egress to the many properties, including many owned by Karney Management Company. The intersection of Jandy and Beatrice is already hazardous due to existing traffic, lack of visibility, speed limit and the fact that it connects two cul-de-sac streets. The increase in traffic proposed by the Project, especially when considered in connection with the cumulative of effects of all other traffic along Jandy and Beatrice, and these other existing conditions, creates a substantially increased hazard at that intersection. [*See also, Exhibits* 5, 6]. The MND completely ignores these conditions.

The MND also fails to analyze, *almost at all*, but certainly in sufficient detail as required by CEQA, construction traffic impacts as well as parking impacts. [*Exhibit* 6]. It is incomprehensible that an adequate transportation/traffic analysis can be deemed "adequate" without a review of construction traffic and parking. Again, where an agency fails to abide the informational requirements of CEQA by omitting material necessary to informed decisionmaking and informed public participation, as it has here, harmless error analysis is inapplicable and the agency is deemed to have erred and abused its discretion. *Lotus v. Department of Transportation* (2014) 223 Cal.App.4th 645.

Finally, the MND fails to adequately analyze impacts on transportation/traffic for all of the reasons set forth in the review completed by Kimley-Horn and Associates, Inc. and Coco Traffic Planners, Inc. [*Exhibits* 5, 6], including lack of adequate supporting evidence and conclusions based upon unsubstantiated and exaggerated assumptions, such as assuming that 10-15% of the Project's traffic will be generated from the west, *i.e.* the Pacific Ocean, a condition that cannot possibly exist, and estimating no northbound movements at the intersection of Westlawn and Jefferson based upon traffic counts being conducted on January 28, 2016 when that leg of the intersection was blocked to northbound traffic, possibly for construction south of Jefferson Boulevard.

m. Cumulative Impacts

The MND's "analysis" of cumulative impacts is indefensible. The MND admits that significant impacts may occur if the proposed Project, in conjunction with the related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together, but concludes that it does not need to do any analysis of such impacts because each additional project will be evaluated and mitigated on a case by case basis (*i.e., separately* without regard for cumulative impacts); therefore, the cumulative impacts to which the proposed Project would contribute would be less than significant.

Such "analysis" completely misses the mark for what is required as a cumulative impact analysis required under CEQA. One of the basic and vital informational functions required by CEQA is a thorough analysis of whether the impacts of the Project, in connection with other related projects, are cumulatively considerable. *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal App.4th 1209. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.[11] *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *CEQA Guidelines* §15355. Proper cumulative impact analysis is vital under CEQA because the full environmental impact of a proposed project cannot be gauged in a vacuum. Indeed, one of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact. **Therefore, cumulative effects analysis requires consideration of "reasonably foreseeable probable future projects, if any."** *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Gentry v City of Murrieta* (1995) 36 Cal.App.4th 1359, 1414.

In fact, the CEQA Guidelines mandate the preparation of an EIR where cumulative impacts are cumulatively considerable:

> **An EIR *must* be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable**. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. 14 CCR §15064(h)(1).

Here, there is no scintilla of evidence, much less substantial evidence, to support the conclusion that the "cumulative impact" of the Project will not result in any potentially significant impacts. There are no other "reasonably foreseeable

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[11] "Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.

probably future projects" listed and none analyzed. Indeed, there is not even evidence that the MND *considered* whether there are cumulative impacts, since all it summarily states is that it did not need to do any such analysis because any additional project will be evaluated and mitigated separately on a case by case basis.

Ironically, the Project's traffic analysis actually identifies 29 *other* projects in the vicinity of the within Project, and evaluates the cumulative traffic impacts of those projects. The MND cannot ignore that existence of these identified *other* projects, which their traffic expert apparently had no problem finding or analyzing. It must evaluate the cumulative impacts of all of these projects with regard to all of the protected categories of environmental impacts under CEQA.

Finally, the MND conclusively states that cumulative impacts of the Project will not result in any potentially significant impacts because any cumulative impacts (which, again, the MND fails to identify) will be mitigated to a less than significant level through compliance with the mitigation measures provided in the "previous sections" of the MND. But there is no evidence whatsoever that the cumulative impacts of the other reasonably foreseeable probable future projects, if any, including the 29 other projects identified by the Project's traffic analysis, were considered in formulating the mitigation measures of the MND and none of them refer, at all, to the other reasonably foreseeable probable future projects. The lack of evidence in the record to support a conclusion that the Project would have *no* cumulative impacts thus tends to support a fair argument that the Project *will* have such impacts.

The failure of this MND to provide for a cumulative impact analysis as required under CEQA is fatal. *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 118 (CEQA requires strict compliance with the procedures and mandates of the statute).

Each public agency is required to comply with CEQA and meet its responsibilities, including evaluating mitigation measures and project alternatives. *CEQA Guidelines* §15020. For all of the reasons set forth herein, the City has failed to do so here.

For all of these reasons, we ask that the City Council deny this Project, as proposed, and require the Applicant to revise the Project in compliance with the compatibility requirements of the LAMC and applicable land use plans governing the Project site.

Only with such revisions, as well as full environmental review in an EIR, should the City re-consider the Applicant's requests.

Very truly yours,

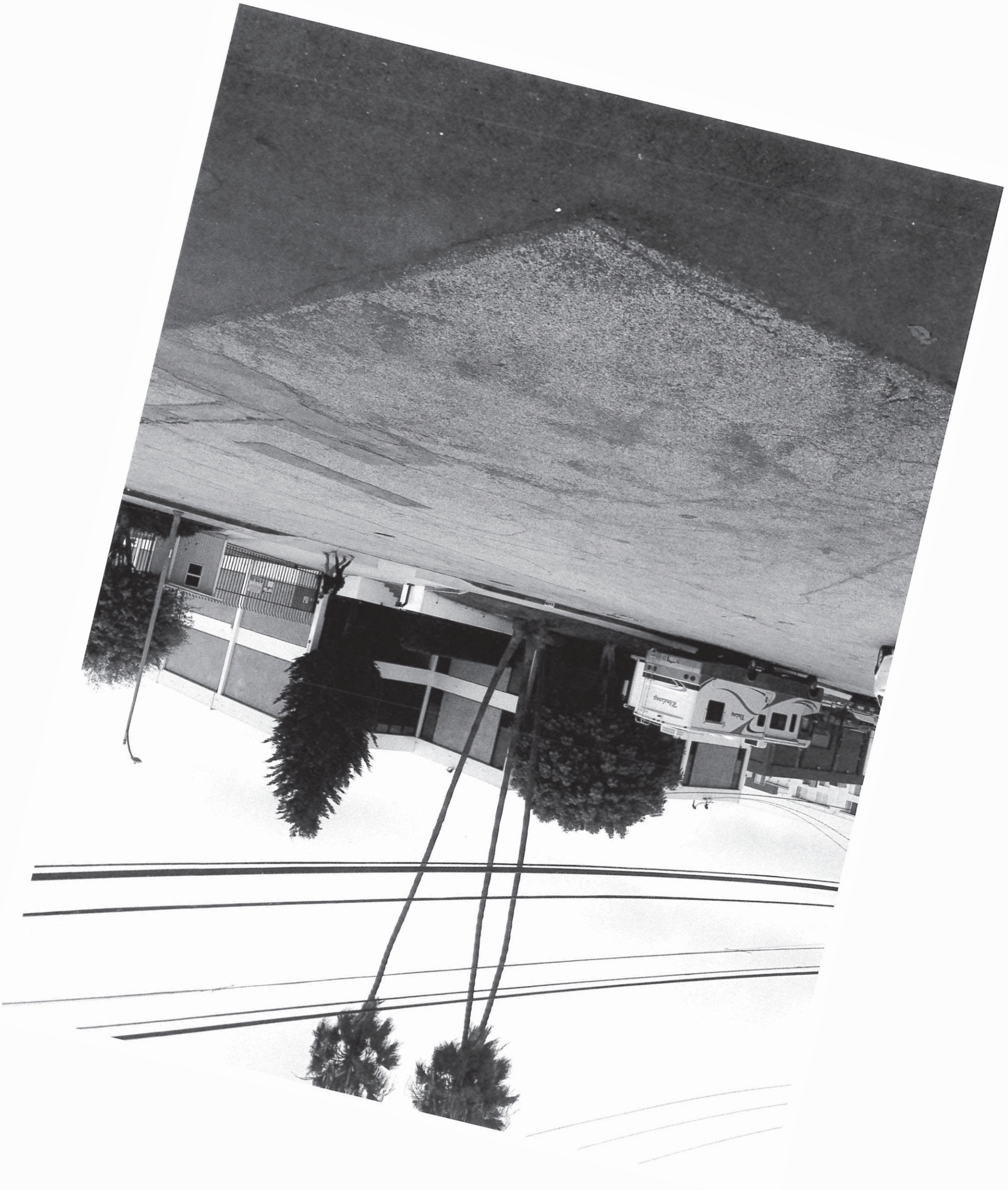
LUNA & GLUSHON
A Professional Corporation

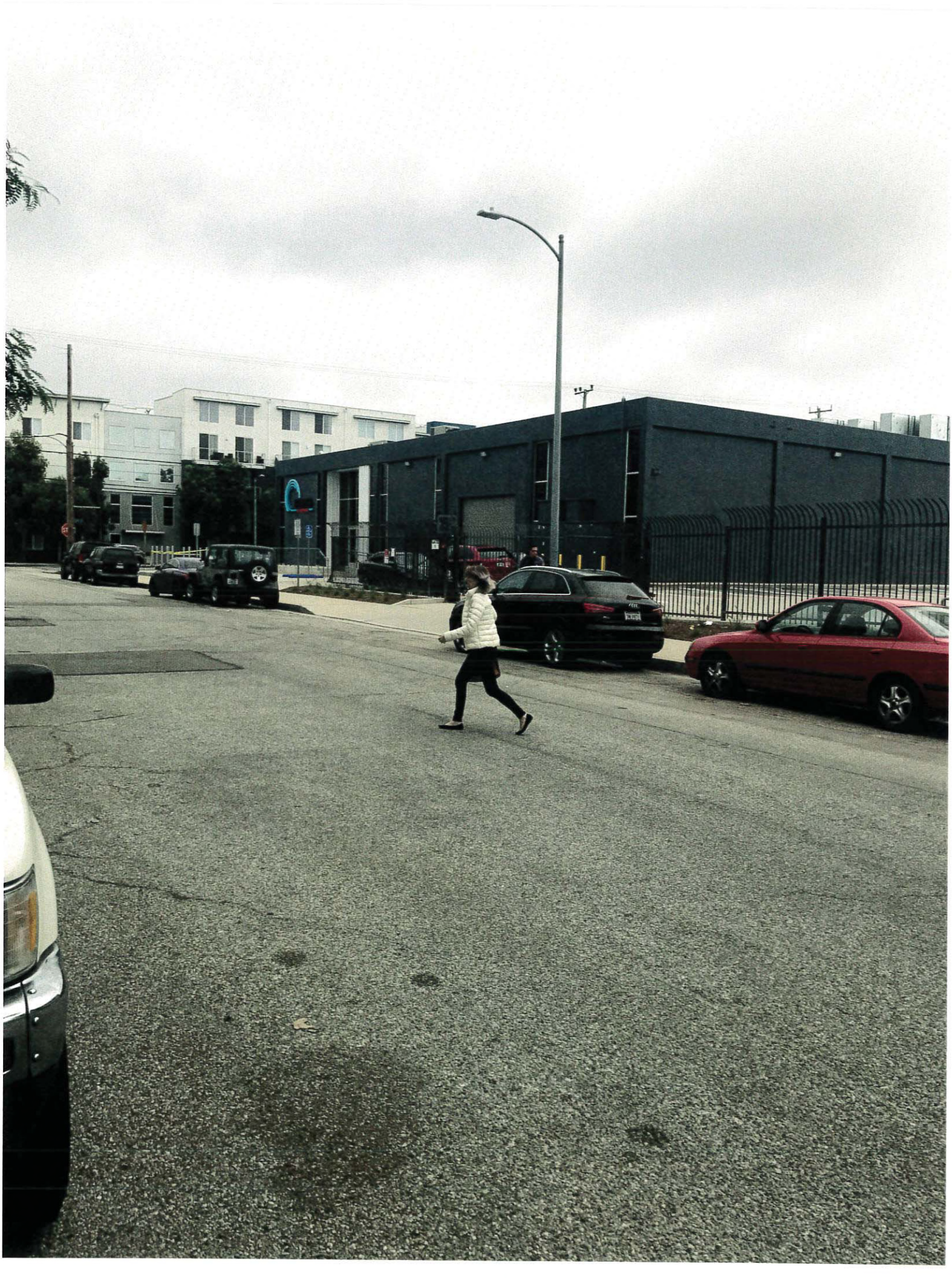
ROBERT L. GLUSHON

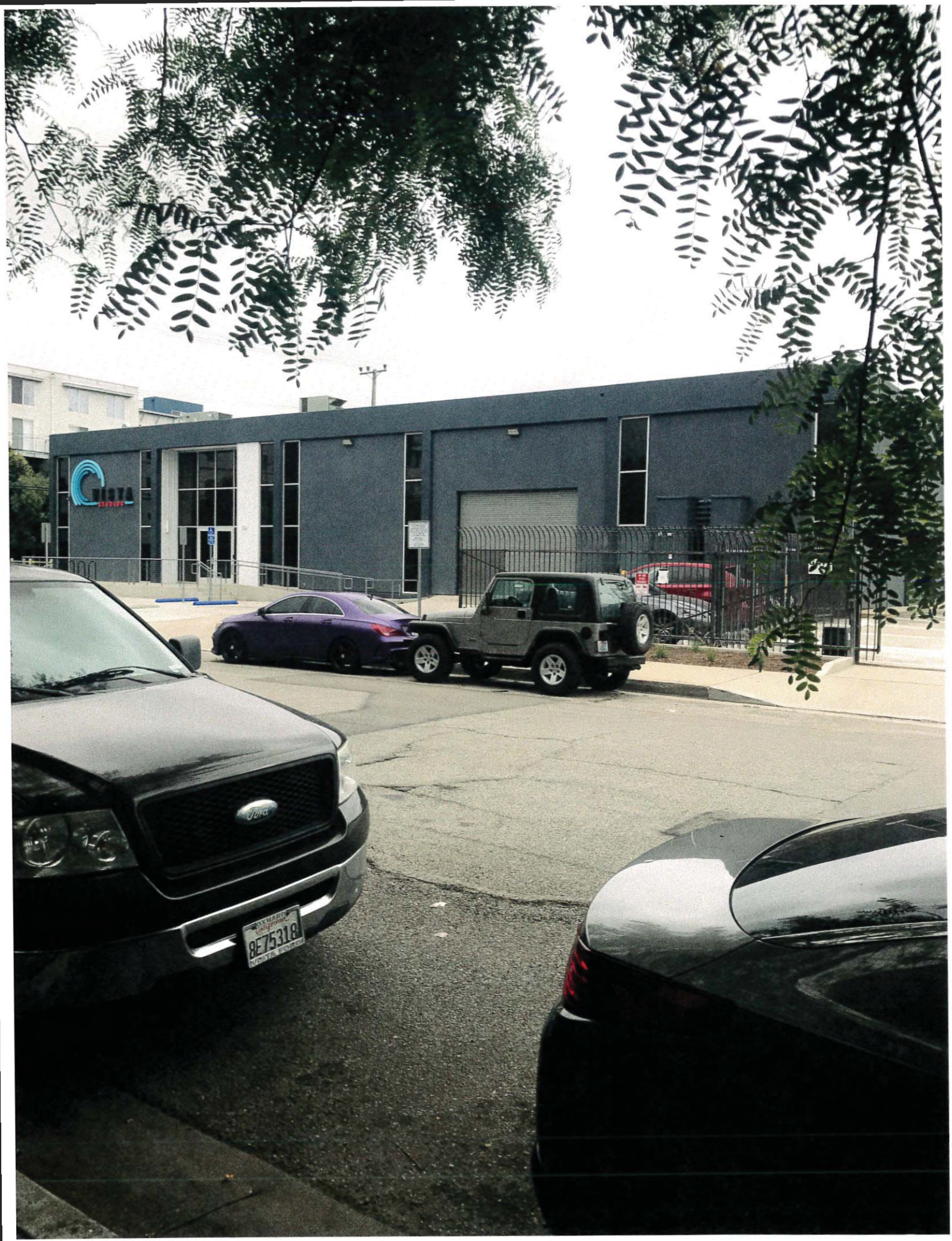
EXHIBIT 1


STOP


SPECTRATEK



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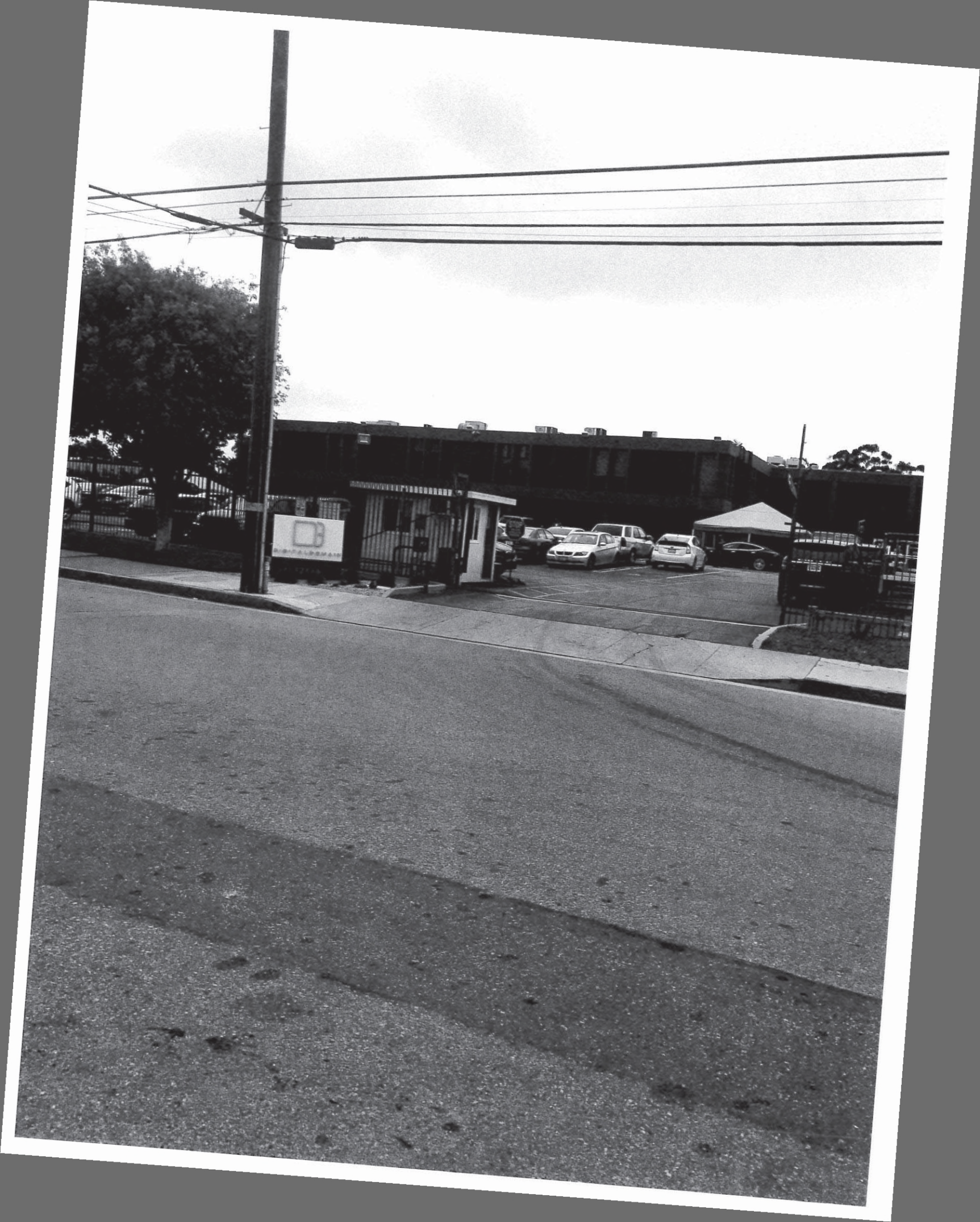


HIGH VOLTAGE


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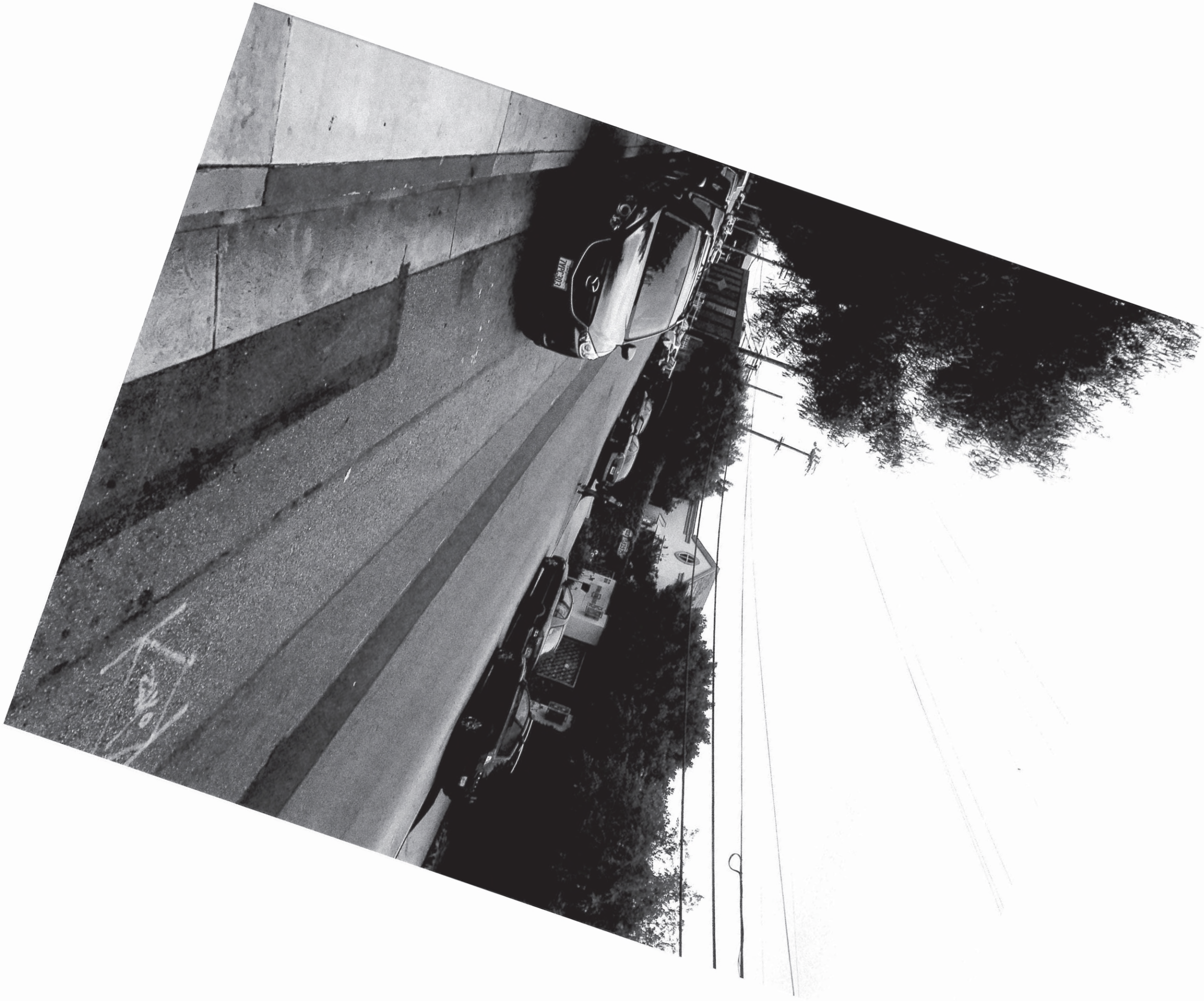
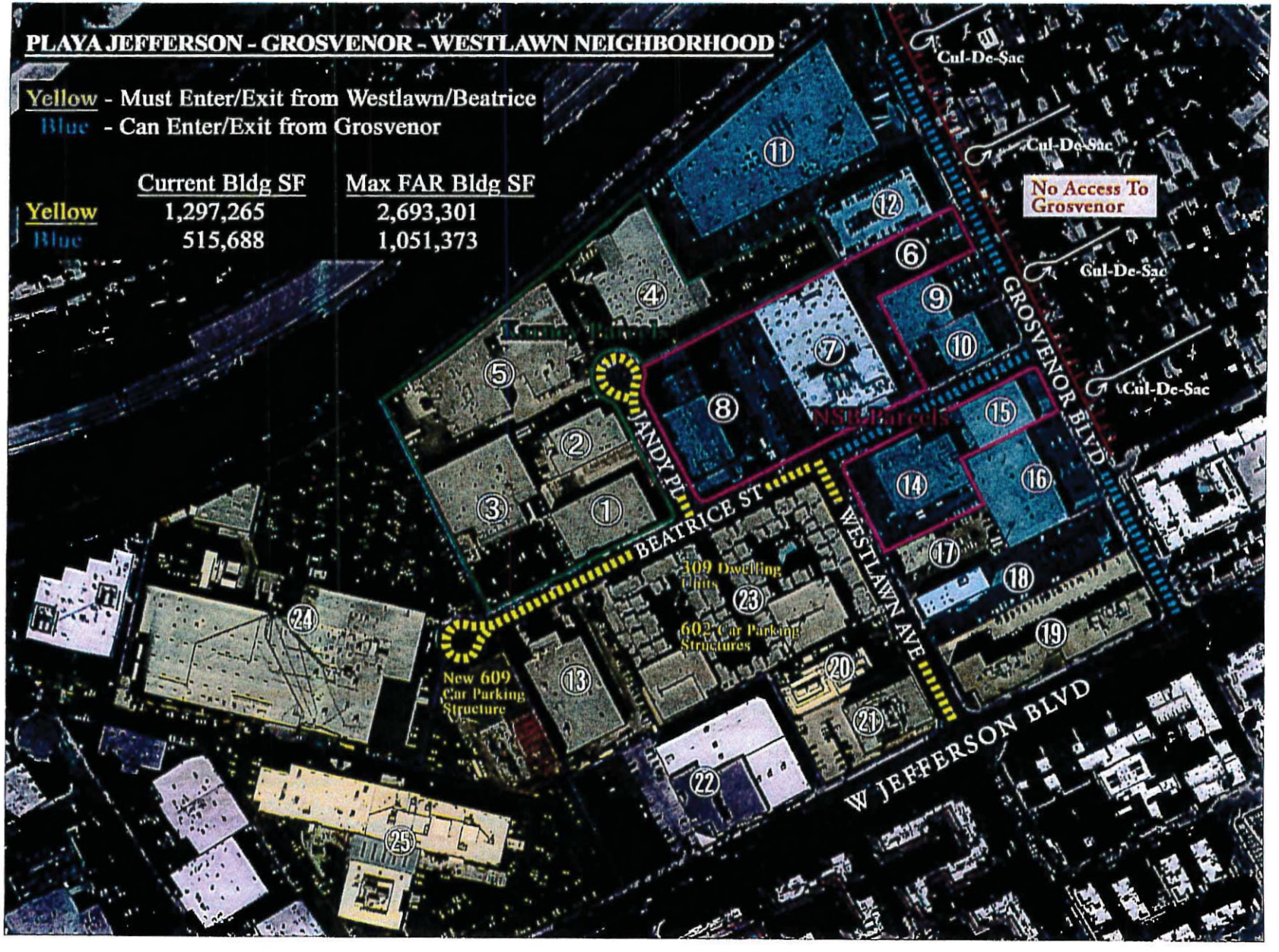


EXHIBIT 2

Building Heights: Playa Jefferson

North of Jefferson, South of Ballona Creek,
West of Grosvenor, East of McConnell

Aerial Map of Playa Jefferson Neighborhood

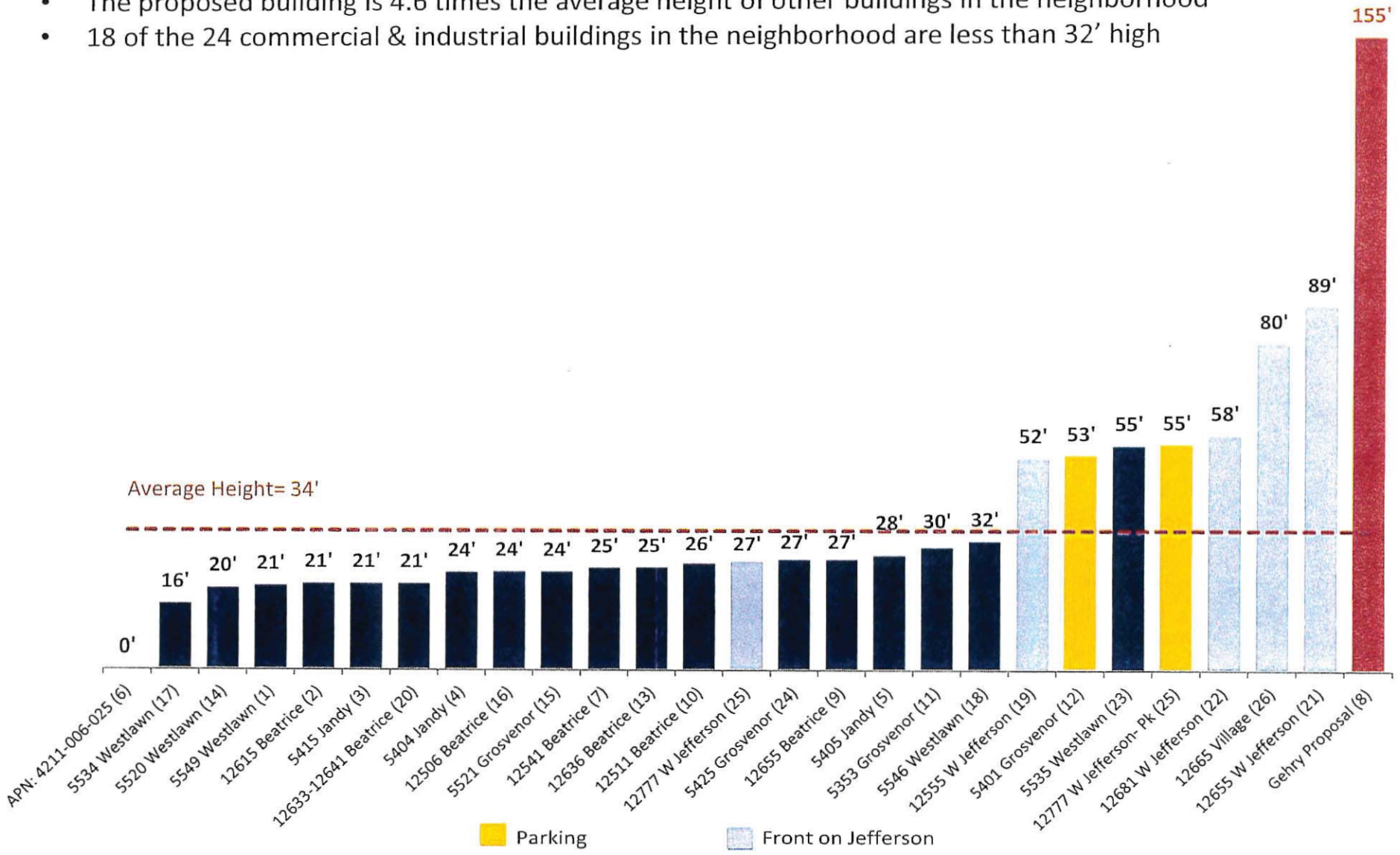


Building Heights: Playa Jefferson

North of Jefferson, West of Grosvenor, East of McConnell, South of Ballona Creek

Key Observations

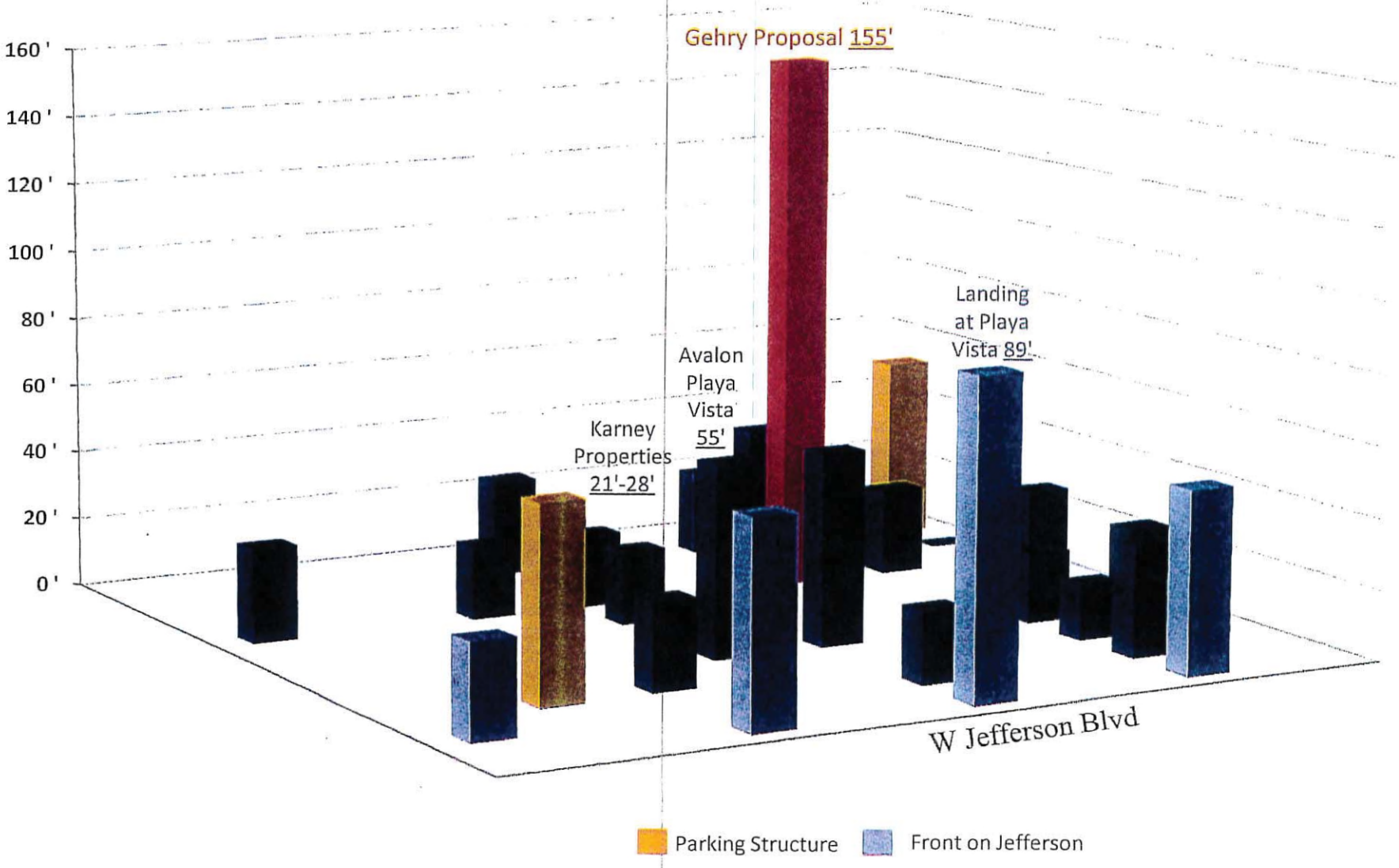
- The proposed building is 4.6 times the average height of other buildings in the neighborhood
- 18 of the 24 commercial & industrial buildings in the neighborhood are less than 32' high



Building Heights: Playa Jefferson

North of Jefferson, West of Grosvenor, East of McConnell, South of Ballona Creek

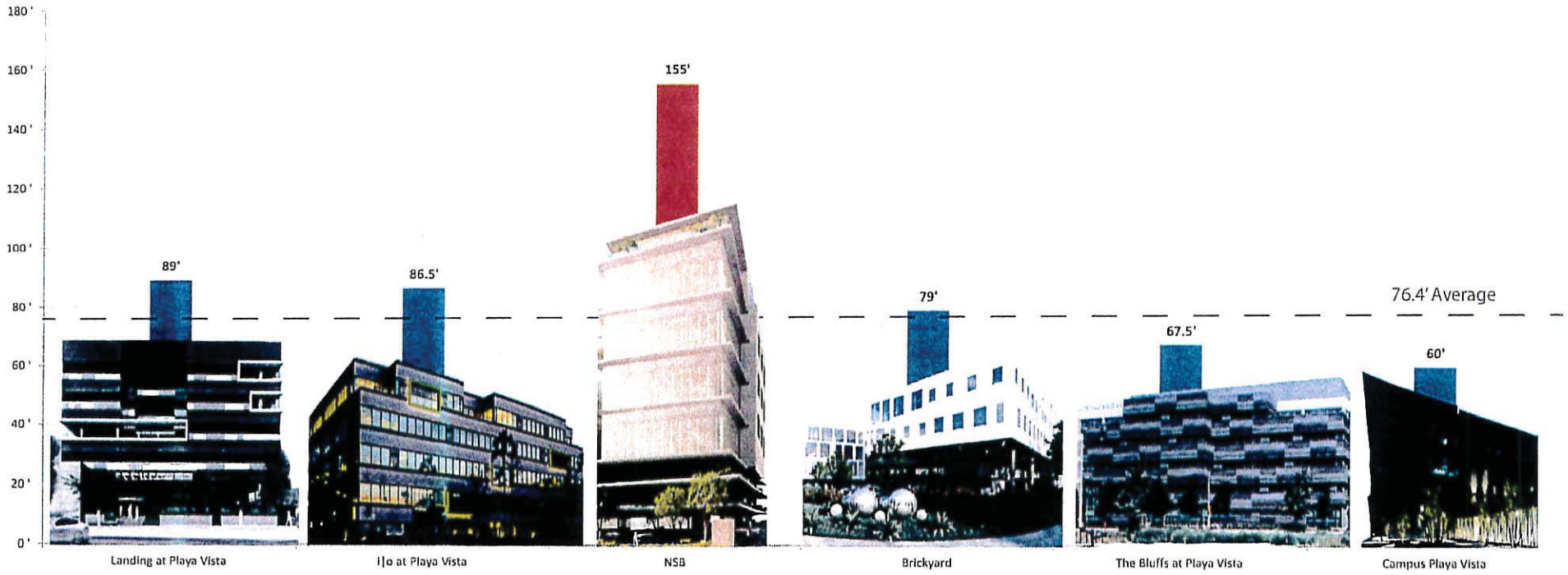
In 3D reality, the proposed structure will be grossly out of scale with the neighborhood



Building Heights: Playa Vista (South of Jefferson)

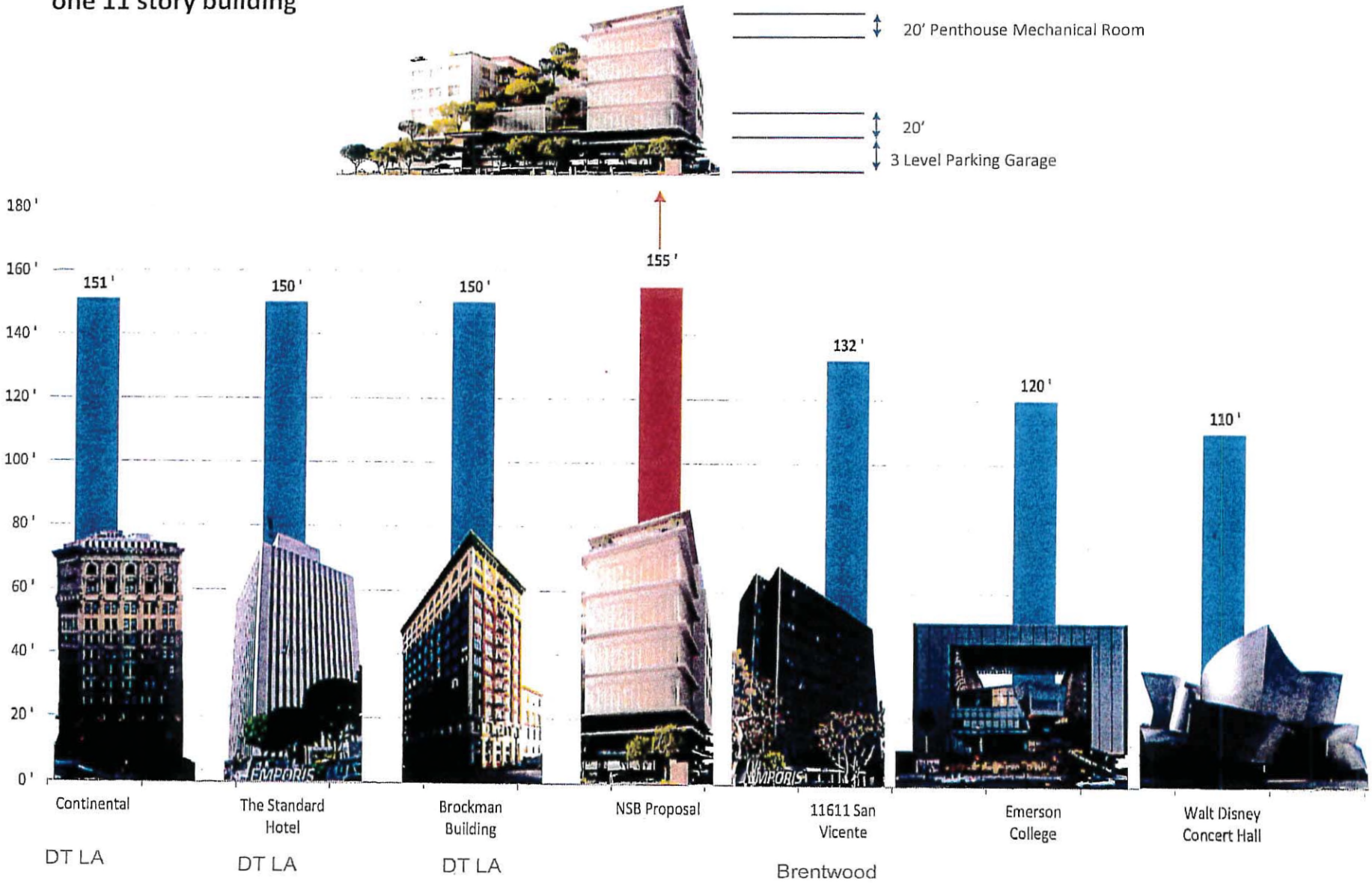
Key Observation

- Proposed building is 2x as tall as average height of comparable office buildings south of Jefferson



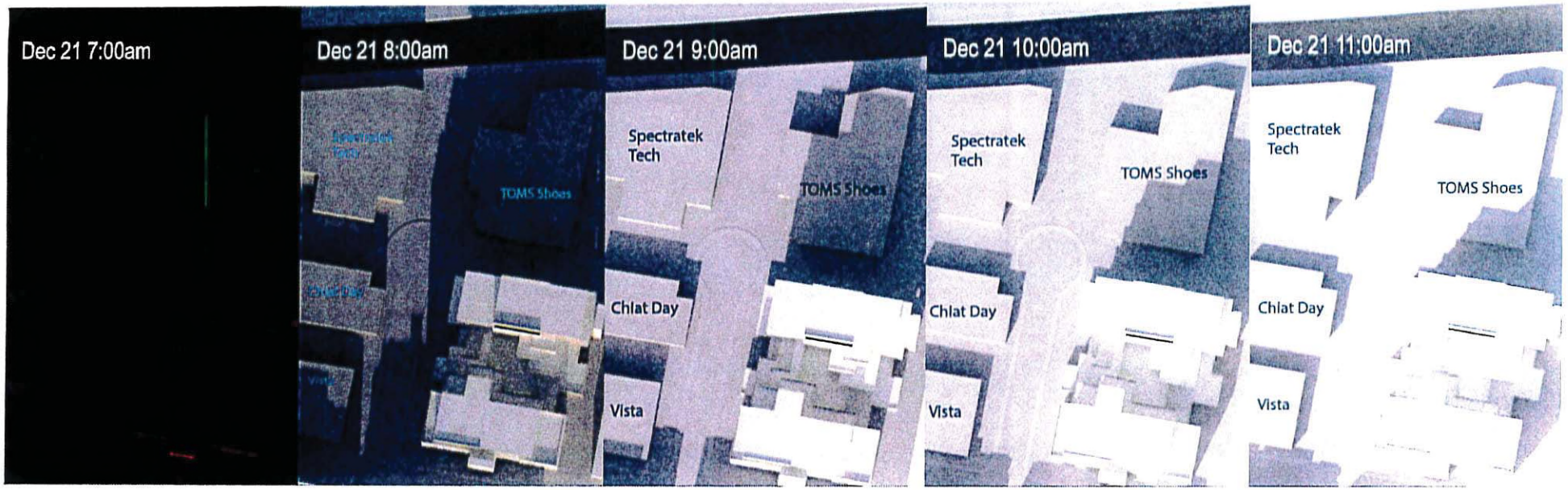
Familiar Buildings of Similar Height in Los Angeles

Due to double height floors, the true height of the proposed NSB buildings are equivalent to one 9 story and one 11 story building



Sun Shade Study

December 21 7:00 am – 11:00 am



FAR Utilization After New Development – Max FAR Allowable is *1.5*

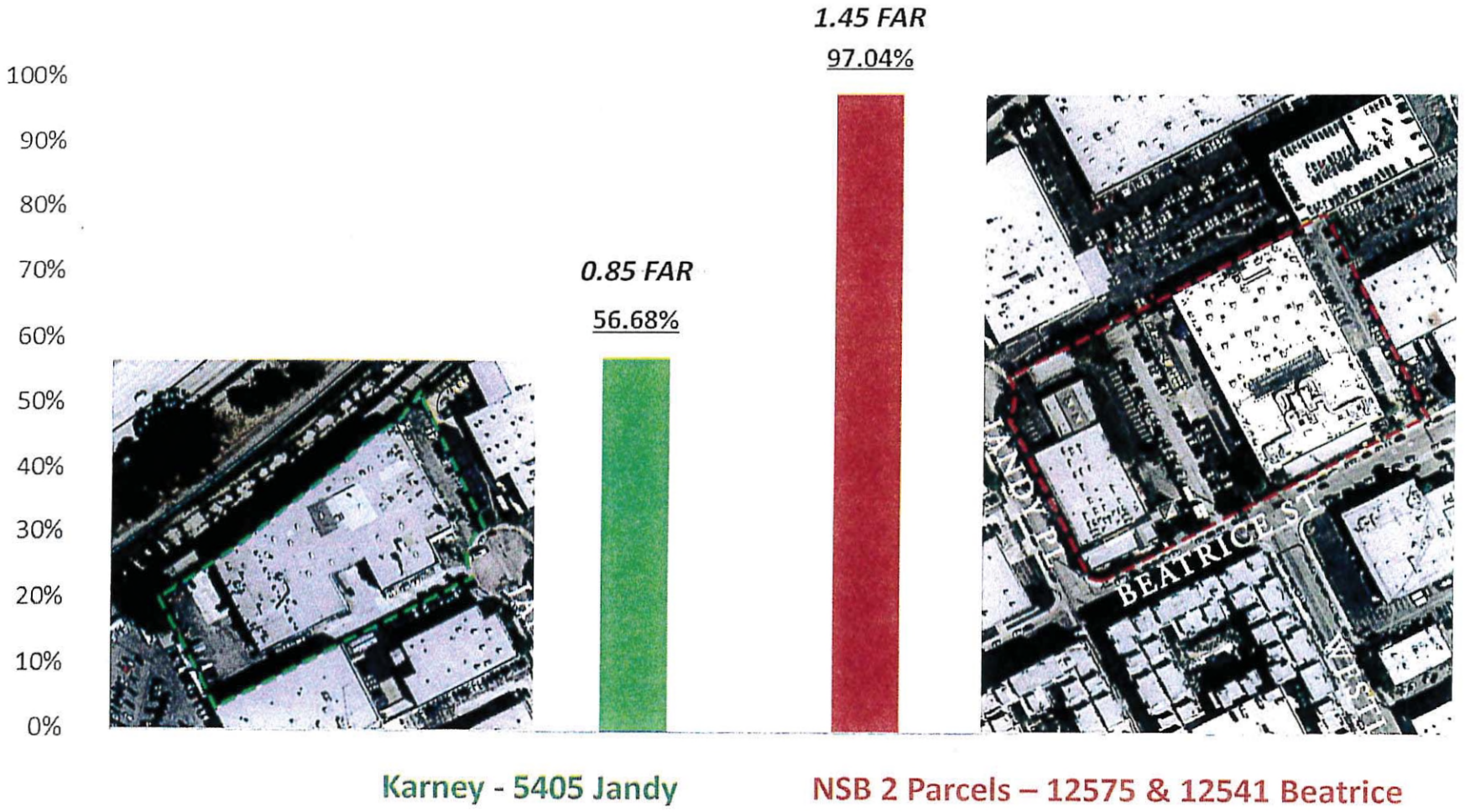


EXHIBIT 3

MEMORANDUM

To: *Luna & Glushon*

From: *CAJA Environmental Services, LLC*

Date: *October 16, 2017 [Revised]*

Subject: *Technical Assessment of the New Beatrice West Project (12553 West Beatrice Street) MND*

This memorandum contains CAJA Environmental Services, LLC's findings and comments on the Mitigated Negative Declaration, dated May 17, 2017 ("MND") for the "12575 Beatrice Street" ("Project"), at 12553-12575 West Beatrice Street, which was prepared by the City of Los Angeles ("City"). Our comments are organized as follows: (i) the first section addresses general issues, as it relates to the environmental documentation under the California Environmental Quality Act ("CEQA") for the Project; and (ii) the second section contains our firm's peer review analysis of the MND. Section II tracks the organization of the MND and contains our specific comments with respect to each Section.

I. GENERAL COMMENTS ON THE MND

As discussed in detail below, several impact areas were not addressed in the MND. CEQA sets out a fundamental policy requiring local agencies to integrate the requirements of CEQA with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively. It is for that reason that CEQA requires all environmental assessment/analysis, including formulation of mitigation measures to mitigate potential environmental impacts, to occur before a Project is approved. The MND fails to disclose necessary information to the public and to the decision-making body by omitting several pertinent CEQA environmental categories and/or by refusing to discuss and fully examine those issue areas to the fullest extent possible.

What's more, specific project information in the MND does not match what is proposed on the accompanying figures within the MND. As detailed below, it is difficult for the reader to understand and comprehend the overall height of the building, grading depths, parking locations, and proposed open space. The MND fails to give accurate and precise information within the MND to assist the public in their review.

The failure to comply with the law subverts the purposes of CEQA if it omits material necessary to inform decisionmaking and public participation.

II. SPECIFIC COMMENTS REGARDING THE MND

1. Impact Areas Were Not Addressed in the MND

Several environmental impact areas were not discussed and/or disclosed in the MND. This decision does not appear to be supported by substantial evidence or any evidence at all. If these impact areas had been analyzed, it appears that they would disclose potentially significant and unmitigable impacts on the environment. The following impact areas should not have been scoped, or left out, of the MND.

- Hazardous Materials (Methane): The MND does not address methane zone impacts. The Project Site is located within the City of Los Angeles Methane Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category. A Methane Gas Investigation Report should be conducted. The investigation should evaluate existing methane conditions. According to the Los Angeles Department of Building and Safety (LADBS), methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation. Specifically, requirements for control of methane intrusion in the City of Los Angeles are specified in Division 71 of Article 1, Chapter IX of the Los Angeles Municipal Code ("Division 71"). Since the Project is within a *Methane Zone,* the LADBS has the authority to withhold permits for construction unless detailed plans for adequate protection against methane intrusion are submitted. As such, the Site is located in a Methane Zone, as mentioned above, and appropriate mitigation should be listed to reduce potential impacts. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce the scope of such methane impacts.

- Land Use Planning (Agency Regulations): The MND fails to disclose potential impacts as it relates to the regional level and associated land use plans. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the Southern California region's federally-designated metropolitan planning organization. The Project is also located within the South Coast Air Basin and, therefore, is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Neither of the goals or policies of both plans are discussed or disclosed of in the MND. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce regional level land use conflicts, if any.

- Utilities (Energy): The MND scoped out this issue area without sufficient analysis that the Project would have no impacts with respect to utilities and service systems. Additionally, the MND did not take into consideration the recent Porter Ranch gas leak, which has the potential to cost the Southern California Gas Company billions of dollars and may require the curtailment of gas supply to electric generators. The California Public Utilities Commission already has ordered a reduction in the volume of available gas for certain gas storage facilities in the region, which may impact the available supply of natural gas for the Project. This issue was improperly left out of the MND and requires analysis, as well as a full discussion of electricity supply and demand, as required by Appendix F, of the State CEQA Guidelines.

- Cumulative Analyses: The MND does not include a reliable or defensible cumulative impacts analysis, as required by CEQA. One of the basic and vital informational functions required by CEQA is a thorough analysis of whether the impacts of the Project, in connection with other related projects, are cumulatively considerable. Proper cumulative impact analysis is vital under CEQA because the full environmental impact of a proposed project cannot be gauged in a vacuum. Indeed, one of the most important environmental lessons that has been learned is that environmental damage often occurs incrementally from a variety of small sources. These sources appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact. Therefore, cumulative effects analysis requires consideration of "reasonably foreseeable probable future projects, if any." *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184; *Gentry v City of Murrieta* (1995) 36 Cal.App.4th 1359, 1414. This issue was improperly left out of the MND and requires analysis, per CEQA standards.

2. The Project Description (Section 2) Is Inadequate & Does Not Meet CEQA's Requirements

The Project Description is confusing and does not provide an accurate and stable definition of the proposed Project that is easily understood by the public or decisionmakers. These clarifications are necessary in order for the general public and decisionmakers to adequately review the MND. It is very unclear at times what the Applicant is proposing. Our findings are below.

- The description of the surrounding uses is inadequate. The MND makes no mention of the existing schools situated to the north and east of the Project Site.

- It is unclear if the proposed 135-foot height listed in the Project Descriptions is accurate or not. The language suggests that an additional 20-feet of mechanical penthouse component is also proposed. Is this considered part of the overall height of the structure? This requires clarification.

- The MND states that retail shops, restaurant uses, and lounges are included as part of the overall development and use of the Project site. However, the exact size and location of these mid- to ground-floor retail uses are not fully disclosed or calculated into the total of the available square-footage of the Project. Are these retail shops, restaurant, and lounge uses considered commercial square-footages? This does not make sense and is confusing. To evaluate the Project, the public must be given clear information regarding the amount of commercial square footages associated with such uses to fully understand the overall scope of potential impacts. Throughout many Sections of the MND (and as outlined further below), the analysis states that new retail uses are being proposed which will attract visitors to the site, yet, in other areas, the Project is advertised as a development with no commercial square-footage and claims that the retail uses will be primarily, if not entirely, used by onsite visitors or users of the office space. These issues need to be clarified in greater detail, as the narrative is extremely confusing at times and does not allow the public to meaningfully review the Project.

- The Project Description states that roughly 3,400 square-feet of the Project would be dedicated (we think) to solely retail and restaurant uses. However, the Traffic Impact Study does not include any retail and restaurant square footages in its trip generation estimates. How much floor area will actually be dedicated to restaurant

and dining space for the Project? These glaring inconsistencies illustrate that the Project Description shifts throughout the MND and makes it impossible to properly assess the significance of Project impacts. Please explain the reasons for the differences in floor area dedicated to restaurant and dining uses under the MND when compared to the Traffic Impact Study.

- Where are the proposed outdoor bars and restaurants to be located? They are not shown on the provided Site Plan. The public should be given clear information as to where they are to ensure that projected noise and air quality modeling are executed accurately. This is not indicated on the Site Plan.

- Regarding construction, Section 2.3 of the MND states that Project construction "would occur over approximately 22 months." This 22-month figure is used throughout the document, but it understates the actual construction time period required for the Project. The MND goes on to state that several months of infrastructure work would also be required, but since it "would precede" the 22-month construction period, it is not included as part of the overall construction time period. The "infrastructure work" should be properly considered part of the construction work required for the Project and the MND's description of the Project's construction duration makes the length of construction time required appear shorter than is actually proposed for the Project.

3. The Environmental Setting Is Non-Existent

The Environmental Setting Section, which is absent from the MND, fails to adequately disclose what the Applicant proposes to build. The MND should include a Section explaining and clarifying that the analysis of the environmental baseline assumes a built environment with several structures onsite, with the full range of potential/estimated environmental impacts already in existence and occurring onsite. This would help establish what is being analyzed in the MND when disclosing the City's significance conclusions under the various CEQA environmental categories.

In addition, there is no cumulative project list contained in the Project Description. Please correct these glaring errors and provide an accurate cumulative impact analysis based on a City approved related projects list.

4. Environmental Impacts (Section 3) Are Not Properly Assessed

Those limited environmental impact areas that are studied under the MND are not analyzed properly. The MND either understates identified significant impacts or improperly concludes that impacts are less than significant or that mitigation would reduce impacts to less than significant levels. The flaws as to each of the impact areas discussed in Section 4 of the MND are discussed below.

3.1 Aesthetics

The Aesthetics Section contains numerous errors, inconsistencies, omissions, and incorrect assumptions and conclusions. They are summarized here.

- The aesthetics impacts of the Project were improperly analyzed. The section does not delve into overall design and compatibility of the building with existing structures and uses in the surrounding area. For example, what are some façade improvements and colors that would complement the area? The overall height

of the structure, listed at 135-feet, seems misleading, as the number does not consider the proposed Penthouse on the roof of the proposed structure. Proposed landscaping should also be discussed and show its compatibility with the neighborhood. With this, what is the actual character of the building and would the structure be compatible with the surrounding character, which is not fully disclosed in the MND. This needs to be expanded.

- Regarding shade and shadow sensitive receptors, the MND fails to mention that there exists an outdoor gathering space directly north of the Project Site. According to the *L.A. CEQA Thresholds Guide,* shadow sensitive uses are "facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors." These land uses are termed "shadow-sensitive" because sunlight is important to function, physical comfort or commerce. The *L.A. CEQA Thresholds Guide* calls for a determination of whether there are any shadow-sensitive uses to the north, northwest, or northeast of a project, as that is generally the path shadows will be projected. As such, the MND falls inadequate in this analysis. As mentioned, directly north of the Project Site exists an outdoor gathering/seating/eating location for adjacent office building works. The MND fails to identify this particular area as shadow sensitive use, which it is. This needs to be discussed and disclosed in the MND.

3.3 Air Quality

The Air Quality Section contains numerous errors, inconsistencies, omissions, and incorrect assumptions and conclusions. They are summarized here.

Construction Air Quality Impacts

- Regarding construction impacts, numerous errors were made with respect to the CalEEMod analysis. These errors resulted in construction air quality impacts being understated. The CalEEMod analysis should be redone using assumptions more consistent with industry standards. Errors and improper assumptions include the following.

    - The construction phasing in the CalEEMod analysis conflicts with the Project Description. As identified in the MND, early infrastructure work (e.g., storm drain line, retaining wall, shoring) would precede a 22-month construction period. The CalEEMod analysis uses a 22-month process after the initial infrastructure shoring period. Why is that? What effect does this have on the modeled emissions? Are they lower or higher? This must be explained.

    - The CalEEMod air quality analysis assumes a very low level of equipment associated with the construction phases.

- Haul trucks are proposed to stage at Jefferson Boulevard south of the Project Site. A CO hot-spot analysis should have been conducted for this staging location, which is adjacent to heavily congested intersections along Jefferson Boulevard.

- A Health Risk Assessment (HRA) should have been conducted to assess potential construction impacts to neighboring schools and nearby residential sensitive receptors. Although the elementary school is greater than 100-feet from the Project Site, construction is anticipated to last 22 months, though could be longer. Given the high level of diesel emissions and the close proximity of an existing elementary school, a health risk assessment should have been completed. What's more, there exist several residential structures immediately south/southwest of the Project Site along Beatrice Street, roughly 50-feet in distance from the boundary of the Project Site. Specifically, an HRA addresses potential impacts to people exposed to toxic air contaminants (TACs) anticipated to be released as a result of a Project. Potential impacts to human health associated with releases of TACs may include increased cancer risks and increased chronic (long-term) and acute (short-term) non-cancer health hazards from inhalation of TACs by people working, living, recreating, or attending school on or near the Project site. The objective of an HRA is to estimate increased incremental health risk associated with construction activities of a Project. When performing a construction Health Risk Assessment, all sensitive receptors within 100-feet should be considered. What was the reason for not completing one as part of the MND? Health risks to elementary school kids and nearby residential sensitive receptors must be addressed.

Operational Air Impacts

- Operational air impacts are largely the result of off-site mobile sources. The MND states that "[t]he estimate of total daily trips associated with the Proposed Project was based on the Traffic Impact Analysis prepared ..." As discussed below, the Traffic Impact Study substantially understates the number of daily trips, since it uses solely an office use generation for its trips, when clearly there are restaurant and retail uses proposed. As a result, the emission volumes are also understated. Mobile emissions must be recalculated using the correct number of daily trips.

- The MND states that the proposed Project would not be a source of toxic air contaminants. This ignores the fact that there will be a substantial increase in truck deliveries to the Project Site as a result of the commercial uses that will now need to be serviced. Exposure to TACs is exacerbated by the Project site's location immediately Playa Vista and north of Jefferson Boulevard. The proposed Project contains office uses and restaurant uses, both sensitive land uses. Accordingly, a mobile health risk assessment should have been conducted for the Project's users to ensure that the proposed "Project is not exposing sensitive receptors to substantial concentrations of DPM." (Id.) Please include such an assessment in the MND or explain why it is not included.

- The Project could also result in a cumulative air quality impact, which was not disclosed for some reason. The proposed growth in population from the Project could exceed the 2020 projections for the City in the adopted 2012 AQMP. As such, the Project would conflict and obstruct implementation of the applicable, federally-approved air quality attainment plan for the region. This potential impact is not recognized. It should have been.

3.5 Cultural Resources

The Cultural Resources Section does not provide adequate mitigation to reduce a potential impact to a less than significant level – ultimately failing as an informational document.

The proposed MND mitigation mentions that if cultural resources (including archaeological and paleontological resources) are found on-site during grading and excavation, then a qualified archaeologist/paleontologist will evaluate the find. Given the cultural resources environment near the Playa Vista development south of the Project Site (and surrounding area), this mitigation measure is insufficient to mitigate impacts to a less than significant impact. As found in the Village at Playa Vista Final RS-EIR (August 2009), the longer-term placement of buildings in the area would limit future access to the soils underling the Play Vista Site that have been rated as having archaeologically and paleontologically high impact significance. With this, mitigation measures were required regarding the location of any potential resources to be included in and archived as part of the treatment plan prior to earthwork being performed. Effective mitigation measures should include an on-site monitor during all grading and excavation activities. Similarly, a qualified Archaeologist and Paleontologist should be retained to develop and implement a monitoring program for construction activities that could possibly encounter older sedimentary deposits and/or human remains. The qualified Archaeologist and Paleontologist should also attend a pre-grading/excavation meeting to discuss a monitoring program prior to any earthwork being performed. If cultural resources are found, a qualified Archaeologist and Paleontologist must be required to prepare a report regarding the find and its treatment effort to be submitted to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies. This report must include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register.

3.6 Geology and Soils

The Geology and Soils Section has many inconsistencies, as detailed below:

- Per the MND, it is unclear if the proposed grading (and subsequent disturbances to existing soil) are fully detailed and explained in the analysis. As proposed, the Project would excavate soil up to 20-feet in depth. This seems unrealistic for a development that is proposing two-levels of underground parking. Each level would typically be roughly 10-feet in depth. This 20-foot depth number seems to not take into account footings and related structural items needed to support a building of the size proposed. What's more, the Geology section states that groundwater may be encountered less than 30-feet in depth, but provides no mitigation in case groundwater is encountered. This seems confusing and misleading. Also, with these inconsistencies, how are we supposed to know if loss of topsoil and ground surface disturbances are accurately disclosed and presented in the MND? This needs to be discussed in more detail in the MND.

3.7 Greenhouse Gas Emissions

The Greenhouse Gas Emissions Section contains numerous errors, inconsistencies, omissions, incorrect assumptions, and incorrect conclusions – ultimately failing as an informational document. The MND fails to compare the Project's impacts against all applicable climate action plans and policies. When the MND compares the Project's greenhouse gas (GHG) emissions against a draft 2010 threshold of significance raised by SCAQMD Staff during a working group process, it fails to properly conclude that the Project would exceed that draft threshold. The input assumptions used in the CalEEMod analysis also understate potential construction impacts and require updated modeling to properly disclose construction-related impacts. Specific comments are as follows.

- The Regulatory Setting Section of the MND is cursory, outdated, and inaccurate. Some examples are provided below:

- The MND fails as an informational document because it does not analyze the Project's consistency with Executive Orders S-03-05 and B-30-15. These Executive Orders establish mid-term (2030) and long-term (2050) emission reduction targets for the State. The failure to consider the Project's consistency with the State's climate policy of ongoing emissions reductions reflected in the Executive Orders, which importantly are tied to the atmospheric concentrations of GHGs necessary to stabilize the climate, frustrates the State's climate policy and renders the MND legally deficient and inadequate as an informational document. This analysis must be completed.

- Although the MND mentions Assembly Bill 32 (AB 32), which focuses on achieving GHG emissions equivalent to statewide levels in 1990 by 2020, the MND fails to mention and/or discuss Senate Bill 32 (SB 32). On September 7, 2016, Governor Brown signed into law a measure that extends AB 32 another ten years to 2030 and increases the State's objectives. This is known as SB 32. SB 32 calls on Statewide reductions in GHG 40 percent below 1990 levels by 2030. This analysis must be completed and/or discussed in detail within the MND.

- As mentioned above, the MND compares the Project's GHG emissions against a draft 2010 threshold of significance raised by SCAQMD Staff during a working group process. The MND fails to properly conclude that the Project would exceed that draft threshold. Specifically, in September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. As the Project exceeds a 2020-derived screening level, it is only logical to assume that the Project also would exceed a 2030-derived screening level, should one be calculated/extrapolated. If application of the draft SCAQMD CEQA Threshold Working Group's GHG threshold considers the Project potentially significant using the state's 2020 climate target, then it misleads the public and the City decision-makers to not more closely assess the Project's consistency (or lack thereof) with the state's 2030 climate target. This analysis must be completed and/or discussed in detail within the MND.

- The analysis fails to describe whether the Project incorporates sustainability design features in accordance with regulatory compliance measures to reduce vehicle miles traveled and the Project's potential impact.

- Methane (CH_4) is generally emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[1] With this, for most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon

[1] *United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).*

dioxide, methane, nitrous oxide, and HFCs.[2] Since the Project is in a Methane Zone per ZIMAS, the Greenhouse Gas Emissions section should look closer at this issue and provide additional analysis.

- Similar to the Air Quality section of the MND, the CalEEMod estimates are based on inconsistent activity data for mobile sources that should be resolved. These items include:
    - As noted above, the construction phasing in the CalEEMod analysis conflicts with information in the Project Description under the MND.
    - As noted previously, the CalEEMod GHG analysis assumes a very low level of equipment associated with the construction phases.
    - Several consistency statements mention that the Project is providing many retail and commercial uses, all of which would contribute to the policies of encouraging the creation of jobs. Similar to other comments that have been presented, the MND conveniently picks and chooses when to mention that they are proposing commercial uses, when in fact, the Project Description illustrates very little retail.
- The Proposed Project's cumulative contribution to GHG emissions needs to be calculated and presented. As it is written, there is no reasoned analysis or substantial evidence to support the MND's claims that impacts would be less than significant.

3.8 Hazards and Hazardous Materials

As mentioned earlier, the MND does not address methane zone impacts. The Project Site is located within the City of Los Angeles Methane Zone based on the City of Los Angeles Department of City Planning, Zone Information and Map Access System. These areas have a risk of methane intrusion emanating from geologic formations. The areas have developmental regulations that are required by the City of Los Angeles pertaining to ventilation and methane gas detection systems depending on designation category. A Methane Gas Investigation Report should be conducted.

The investigation should evaluate existing methane conditions. According to the LADBS, methane mitigation is required for all sites located in a Methane Zone or a Methane Buffer Zone, regardless of results obtained in a methane investigation. The Site is located in a Methane Zone, as discussed above, and appropriate mitigation should be listed to reduce potential impacts. By failing to include this CEQA category from the MND's analysis, the public and decisionmakers are prevented from imposing potentially valuable mitigation measures to reduce the scope of such methane impacts.

3.10 Land Use Planning

In general, the MND fails to provide a sufficient level of detail or explanation in order to adequately inform the public and decisionmakers of the Project's consistency with the Land Use Policies and Goals. Most of the consistency

[2] *California Air Resources Board, Climate Change Emission Control Regulations, 2004*

findings are limited to a few sentences total. A deeper level of consistency should have been developed and thoroughly explored within the MND, especially for a development of this size and scope.

For example, the MND concludes that the Project is consistent with respect to the Land Use and Conservation Elements based primarily on the conclusion that it would not increase impacts as to these Elements over and above those resulting from the existing uses at the Project Site, or based on the fact that the Project is similar to existing uses. Whats more, Objective 2-1.1 is listed as a consistent approach to commercial development, however, the Proposed Project is mostly Office related uses and does not provide new services to the existing community.

More glaring, it seems that many land use plans and policy documents were left out of the analysis. The table provided in the MND mentions strictly those goals and objectives of the related Community Plan for the area. No mention of the City's Land Use Element, Open Space Element, Safety Element, Public Services Element, and Do Real Planning Guidelines were listed and disclosed. This is a huge oversight. Where is the consistency analysis with the Regional Comprehensive Plan, South Coast Air Quality Management Plan, and others? Also, there is no mention of consistency with the City's LAMC regarding Floor Area Ratio, Open Space, density, parking, and etc.

These are the types of issues that appear to be missing from and improperly addressed under the analysis in the MND that should be disclosed and considered as part of the land use impact analysis.

3.12 Noise and Vibration

The MND utterly fails to address the fact that there are sensitive receptors that will be significantly impacted from construction noise including the underestimated volume of excavation and the operation of a large parking facility, the loading area and mobile noise from all of the likely vehicles that will have to turn around at the end of the cul-de-sac. To make matters worse, the MND proposes an utterly deficient mitigation measure to address construction noise – Noise XII-27; as a complaint line mitigates nothing.

A complete review of the Noise section of the MND is presented below:

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).

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-1 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.[3] 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

[3] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

projected to experience a construction-related ambient noise level of 71.5 dBA L_{eq}, 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.[4]

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 placards the discretionary authority of who decides what constitutes as "reasonable measures" into the hands of the project itself.

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[4] *It should be noted that the California Department of Transportation (Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013) 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 far 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."*

3.14 Public Services

With regard to Fire Protection Services, the MND fall flat and does not disclose true potential impacts. Is particular, is the Project considered a high-rise structure per LAMC requirements? This is not discussed nor disclosed. This is important since many fire code requirements need to be implemented into the overall design of the Project building. Is a Heli-Pad needed, since the buildings may be considered a high-rise structure? Also, since the Fire Protection Services sections does not provide sufficient detail on existing equipment mix of existing fire stations, are new ladder trucks needed, and if so, how many would be required? This could be a potentially significant impact prior to mitigation measures being incorporated. This needs to be disclosed. With this, are sprinklers required on each floor of the building, due to the overall height of the building and distance to the nearest fire station? It seems the MND is deficient in this area and needs to be revised accordingly.

3.18 Utilities and Service Systems

The Utilities and Service Systems Section does not provide adequate information and is ultimately failing as an informational document. Our firm's comments on the MND are listed below:

- Projected water during construction use must be calculated based on total water usage and not average daily consumption, similar to how Air Quality impacts are calculated. Since the time period required for construction has been extended, construction activities associated with construction will require greater water consumption.

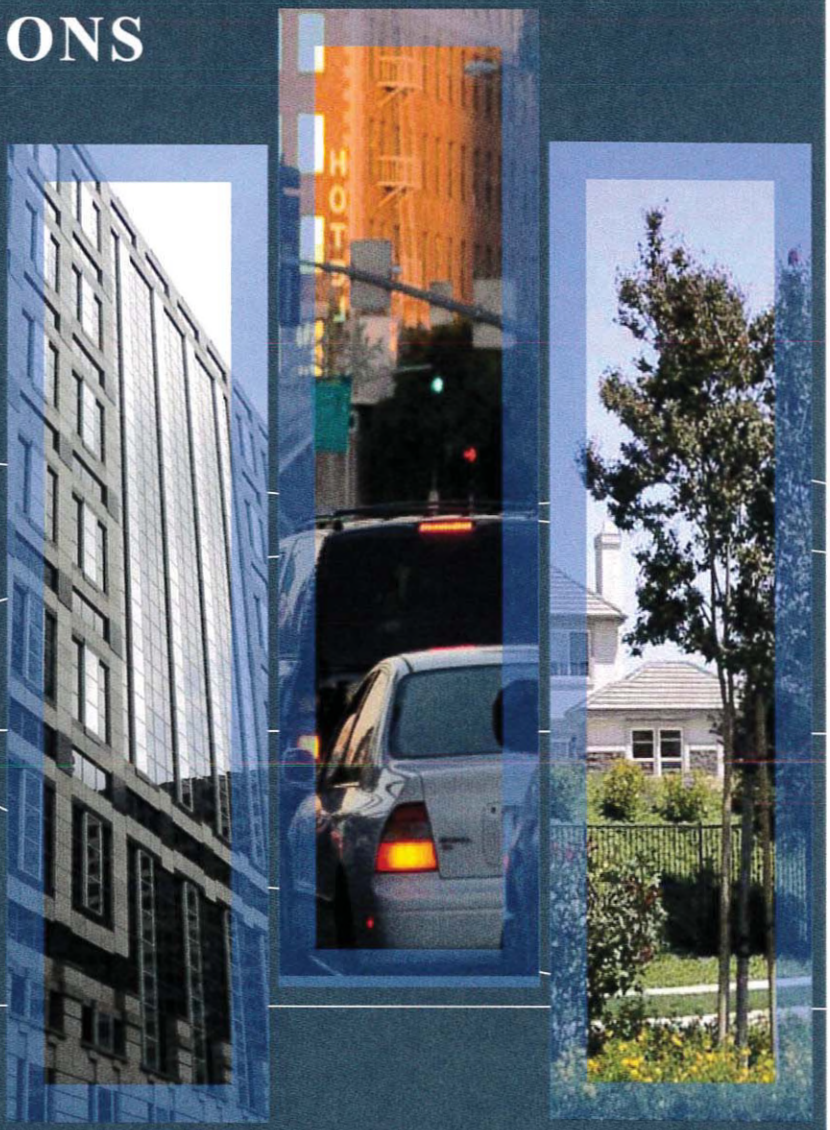
- Not only has the duration of construction is confusing, but the extent and intensity of construction is also unclear. There is no analysis regarding the potential for the increased levels of water demand required for the increased amount of excavation required for the Project.

- The forecasted water supplies assume that state mandated conservation requirements will continue to apply throughout the life of the Project. Please provide an analysis of what happens if the current state mandated measures are relaxed or eliminated.

III. CONCLUSION

In our expert opinion, the MND contains substantial inaccuracies and misleads the reader as to the scale and scope of the proposed Project's environmental impacts. Several CEQA sections are absent or non-disclosed, CEQA required sections within the Project Description are missing, among many other things, as discoursed in detail above. Additionally, substantial evidence indicates that the Project may have significant environmental effects on the environment. As a result, an Environmental Impact Report should be required, or, at the very least, the MND should be substantially revised in accordance with our comments and recirculated for further review, consistent with the requirements of CEQA.

STATEMENT OF QUALIFICATIONS



CAJA ENVIRONMENTAL SERVICES, LLC

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COMPANY OVERVIEW

The CAJA team has provided environmental planning services to the public and private sectors for over 20 years. Throughout those years, the company and staff have earned a reputation for consistent and conscientious performance in guiding projects through the environmental clearance process. The company's status as a well-known and respected leader in the environmental planning field is largely based on the personalized, accessible, and honest service that CAJA guarantees to each and every client.

CAJA staff members are fully prepared to identify and address a wide array of environmental issues. CAJA's project experience includes environmental clearance documentation and third party review for all types of projects and programs, including:

- Industrial
- Commercial
- Institutional
- Residential
- Mixed-Use
- Entertainment/Events
- Public Sector
- Subdivisions
- Coastal Development
- Urban Infill

Led by its reputable project management staff, CAJA's commitment to high quality, efficient, and individualized service is carried through to every project.

CAJA Environmental Services, LLC

COMPANY SERVICES

CAJA offers a broad range of environmental consulting services with a particular emphasis on California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documentation. In addition to CEQA and NEPA related analysis and documentation (described in detail below), CAJA provides specialized environmental analyses and services to meet each client's individual needs. CAJA's diverse assortment of services includes:

- CEQA/NEPA Documentation
- Aesthetics/View Studies and Simulations
- Air Quality Studies
- Noise Studies
- Land Use/Zoning Analysis
- Environmental Review Management
- Mitigation Monitoring Programs
- Peer Review Services
- Expert Witness Testimony
- Environmental Constraints Analysis
- Strategic Assistance
- Project Benefit Analyses
- Preparation of Community Impact Reports
- Water Supply Assessments

CAJA Environmental Services, LLC

ENVIRONMENTAL IMPACT REPORT/ STATEMENT PREPARATION AND TECHNICAL ANALYSIS

CAJA approaches the preparation of each environmental document with an emphasis on quality and thoroughness of analysis. Because a project's environmental document is sometimes scrutinized by interested parties, the potential environmental effects of the project must be fully analyzed and disclosed. Although any environmental document can be challenged, a document that is prepared using a comprehensive approach with appropriately conservative assumptions is likely to withstand any legal challenges that might be raised. In addition, an Environmental Impact Report/Statement (EIR/EIS) must respond directly to issues introduced by responsible agencies, interest groups, and community organizations. A document that provides thoughtful and well written responses to issues raised during the environmental review process is the best means of allowing applicants to proceed with their projects in the most expeditious manner. CAJA is responsible for all document preparation tasks, including:

- Reviewing quality and content of all technical analyses;
- Ensuring compliance with style, format, and content requirements of responsible and lead agencies;
- Reviewing technical methodologies; and
- Developing new methodologies as appropriate to meet the specific needs of a particular project.

Additionally, since CAJA specializes in environmental analysis and documentation, the project management staff can apply all available resources towards regularly upgrading our analytical approach and quality standards. With regard to this, the firm has earned a reputation for being conscientious in its approach and responsive to tight schedules and emergent problems. CAJA's EIRs are prepared to the standards and requirements of CEQA, the State CEQA Guidelines, the Office of Planning and Research guidelines, State planning and zoning laws, and applicable lead agency regulations. Environmental documents are always prepared in a manner that meets CAJA's exacting standards of quality, with specific emphasis placed on a clear and substantive writing style.

CAJA Environmental Services, LLC

INITIAL STUDY/NEGATIVE DECLARATION & ENVIRONMENTAL ASSESSMENT/FINDING OF NO SIGNIFICANT IMPACT PREPARATION

CAJA specializes in a wide-ranging identification of constraints and opportunities created by a project and identification of project alternatives that minimize or avoid significant impacts to the environment. In addition to more extensive environmental documentation, CAJA prepares Initial Studies (ISs) and Environmental Assessments (EAs) that investigate the scope of potential impacts resulting from a project and ultimately determine whether or not an EIR under CEQA or EIS under NEPA is required. If the results of the analysis indicate that an EIR or EIS is not required, CAJA will prepare a Negative Declaration (ND) or Mitigated Negative Declaration (MND) pursuant to CEQA, or a Finding of No Significant Impact (FONSI) pursuant to NEPA. Overall, this process generally includes:

- Preparing Environmental Information forms and a detailed IS or EA;
- Identifying viable mitigation measures and project conditions that would reduce impacts to a less-than-significant level; and
- Preparing, noticing, and distributing the IS/MND or EA/FONSI.

The comprehensive approach CAJA brings to these tasks provides extensive evaluation of a project while eliminating costly and unnecessary environmental analysis.

CAJA Environmental Services, LLC

MITIGATION MONITORING PROGRAMS

CAJA prepares "stand-alone" Mitigation Monitoring Programs that may be submitted concurrently with the primary environmental document or subsequent to environmental review. A subsequent program may be needed to reflect mitigation modification or design changes that could affect mitigation measures described in the primary environmental document.

Programs are developed to meet the specific needs of different agencies, documenting all stages of mitigation implementation, enforcement mechanisms, and criteria to be used to determine compliance with mitigation conditions.

PREPARATION OF COMMUNITY IMPACT REPORTS

In addition to preparing a wide range of environmental documents, CAJA also prepares "stand-alone" Community Impact Reports (CIRs) for both public and private sector clients. The CIR is designed to complement an environmental impact analysis by providing comprehensive and objective information regarding the social, economic, and demographic impacts of a proposed project to project applicants, policy makers, and the public.

CAJA recognizes that for a decision-making body to accurately weigh the costs and benefits of a proposed project, the CIR must address the unique set of circumstances that are relevant to each community at the time of the proposed development. As such, there is no single formulaic approach to the preparation
of a CIR.

CIRs prepared by CAJA utilize spatial Geographic information system (GIS), statistical, and qualitative analysis using applicable detests, state and local economic data, and current Census data to provide a detailed cost-benefit analysis. CAJA's ability to accurately analyze a proposed project's impacts on local businesses, public health and safety, community services, employment opportunities, and housing, makes CAJA a leader in this area of study.

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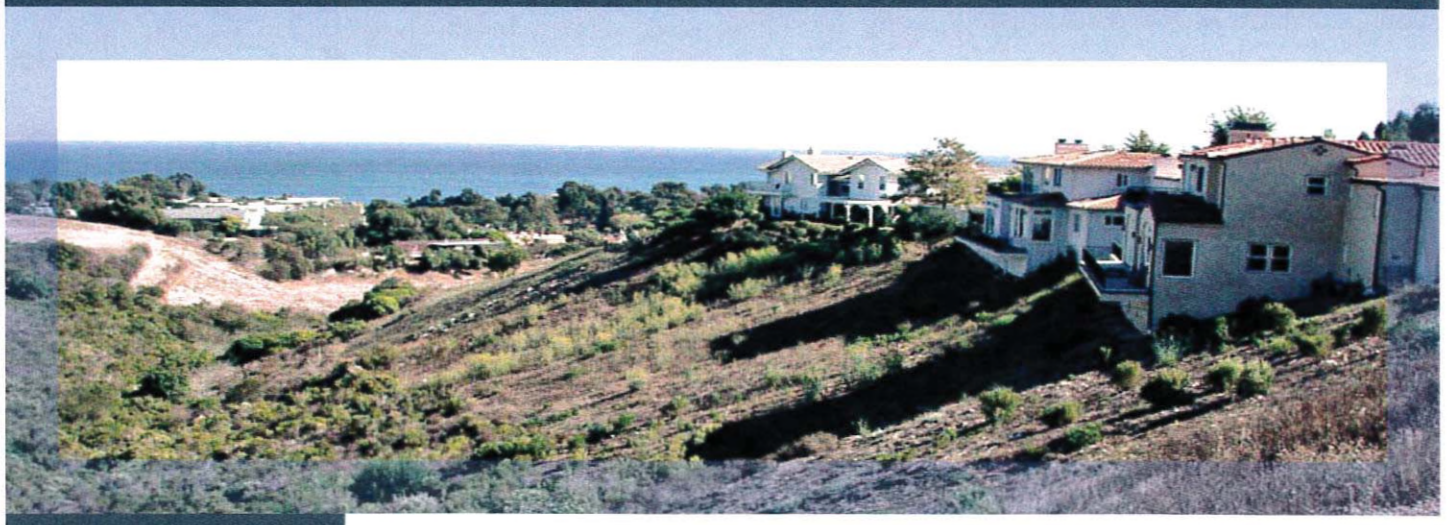

AIR QUALITY ANALYSIS

CAJA offers expert assistance in air quality assessment and mitigation, including:

- Construction Pollutant Modeling
- Project Operational Pollutant Modeling
- Carbon Monoxide Hotspots Modeling
- Air Quality Dispersion Modeling
- Human Health Risk Assessment
- Greenhouse Gas Emission Analysis

EMISSION INVENTORY DEVELOPMENT AND AIR DISPERSION MODELING

Most regulatory agencies require an evaluation of air pollutant emissions levels and/or concentration levels of criteria pollutants such as ozone, nitrogen dioxide, carbon monoxide, sulfur dioxide, and particulate matter to determine the impact of a project to air quality. CAJA utilizes the latest air quality modeling practices and techniques to accurately and precisely quantify air pollutant emission and concentration levels both during construction and after project completion. The type of modeling utilized is determined by the latest industry standards and the needs of both the regulatory agencies involved and the project specific demands.

CAJA Environmental Services, LLC

AIR QUALITY ANALYSIS

The following are some of the models used to develop emission inventories and conduct air dispersion analysis.

CalEEMod

CalEEMod is a statewide land use emissions computer model designed to quantify potential criteria pollutant and greenhouse gas emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operations (including vehicle and off-road equipment use), as well as indirect emissions, such as greenhouse gas emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission factors used in the model (EMFAC2011) includes the Pavley standards and Low Carbon Fuel standards. Further, the model identifies mitigation measures to reduce criteria pollutant and greenhouse gas emissions along with calculating the benefits achieved from measures chosen by the user.

URBEMIS 2007

The URBEMIS 2007 software estimates emissions associated with both construction and operational activities. Construction emissions are evaluated based on the timing of construction phases and the size of the project site. User overrides for defaults provide additional site-specific flexibility. Operational emissions are evaluated for mobile sources operating during the use of a development as well as area sources once the development is operational.

EMFAC 2007

The EMFAC 2007 model estimates emission rates of criteria pollutants for on-road mobile sources operating in California. Emissions are calculated based on vehicle type, model year, ambient weather conditions, and time frame.

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AIR QUALITY ANALYSIS

OFFROAD 2007

The OFFROAD 2007 model estimates the activity and emissions of off-road mobile emission sources such as construction equipment. OFFROAD contains a database of default values for construction equipment information and can calculate emission factors based on the type of equipment and year of use.

ISC3

ISC3 is a steady-state Gaussian plume model which can be used to assess pollutant concentrations from a wide variety of sources associated with an industrial complex. This model is used by the South Coast Air Quality Management District to assess potential localized significant impacts, and can account for the following: dry plume depletion of particles; down wash; point, area, line, and volume sources; plume rise as a function of downwind distance; separation of point sources; and limited terrain adjustment. ISC3 operates in both long-term and short-term modes.

AERMOD

AERMOD is an advanced plume model that incorporates updated treatments of the boundary layer theory, understanding of turbulence and dispersion, and handling of terrain interactions. This is the dispersion model recommended by the United States Environmental Protection Agency (US EPA), and can be adapted to meet the diverse modeling challenges faced in the state of California. Several model enhancements were made as a result of public comment, including the installation of the PRIME down-wash algorithm. AERMOD is a refined model that is utilized to provide the most accurate analysis possible.

CALINE4

The California LINE Source Dispersion Model, Version 4 (CALINE4) is the standard modeling program used by Caltrans to assess carbon monoxide (CO) impacts near transportation infrastructure. The model is based on the Gaussian diffusion equation and employs a mixing zone concept to characterize pollutant dispersion over the roadway.

CAJA Environmental Services, LLC

AIR QUALITY ANALYSIS

HUMAN HEALTH RISK ASSESSMENT

Many regulatory agencies require performing human Health Risk Assessments (HRAs) to evaluate impacts from the release of toxic air contaminants (TACs). These risk assessments estimate cancer risks and non-cancer effects from TAC emissions on nearby residents and other sensitive receptors. Such evaluations include diesel particulate matter from diesel trucks servicing distribution centers and large retail centers, benzene from gasoline service stations, and process TACs at large industrial facilities. In addition, CAJA has the technical capabilities to evaluate the impact from TACs to a project site from existing sources such as the impact of nearby industrial facilities to a proposed residential project. HRAs are prepared by quantifying toxic air emissions and resulting health risks at sensitive receptors using advanced toxic air emission and health risk assessment tools, including Hotspots Analysis and Reporting Program (HARP) and proprietary analytical tools.

HARP

The Hotspots Analysis and Reporting Program (HARP) is a tool that combines emission inventories, air dispersion modeling and risk assessment analysis to estimate chronic and acute health impacts consistent with the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spot" Program.

GREENHOUSE GAS EMISSION ANALYSIS

Since the passage of Assembly Bill 32, California Global Warming Solutions Act of 2006 (AB 32), CAJA has been helping public and private sector clients comply with emerging greenhouse gas regulations and policies. This includes using agency-approved methods to estimate existing and potential greenhouse gas emissions from direct and indirect sources (greenhouse gas inventories), recommending innovative greenhouse gas/air pollutant reduction methods during the construction and operation of a project, investigating the use of renewable energy sources/energy efficient products, and quantifying the benefits of resource conservation (e.g., electricity usage, recycling). CAJA's innovative approach to greenhouse gas analysis utilizes the latest methodologies recommended by reputable sources, such as the Climate Action Registry General Reporting Protocol, the California Air Resources Board (CARB) AB 32 Scoping Plan, the US EPA, and the Greenhouse Gas Protocol developed by the World Resources Institute and the World Business Council.

CAJA Environmental Services, LLC

NOISE ANALYSIS

CAJA offers expert assistance in transportation and community noise assessment and mitigation, including:

- On-Site Noise Measurement
- Residential Noise Studies
- Construction Noise Measurement, Analysis, and Mitigation
- Community Noise Surveys
- Traffic Noise Analysis

CAJA utilizes the following noise modeling prectices and techniques to accurately and precisely quantify ambiant noise levels both prior to construction and after project completion.

NOISE MONITORING

The first step in quantifying the impact a particular project may have on the existing noise environment is identifying the baseline noise conditions. CAJA's technical experts record existing ambient noise levels using the Larson-Davis 831 noise meter. The Model 831's measurement capabilities include instantaneous Sound Pressure Level; Lmin; Lmax; Lpeak and Unweighted Peak Levels; Ln (statistics); Leq; Sound Exposure Level (SEL); and Time Weighted Average (TWA). All of these parameters are measured simultaneously, making this tool very flexible in many different applications.

CAJA Environmental Services, LLC

NOISE ANALYSIS

CONSTRUCTION NOISE

To determine a project's potential construction-related noise impacts, CAJA uses a set of construction noise level data published by the US EPA that outlines the noise ranges of typical construction equipment that can be found at various types of construction sites. Under conditions where a more refined analysis is required, CAJA utilizes the Federal Highway Administration Roadway Construction Noise Model (FHWA RCNM) that is capable of predicting noise from construction operations based on a compilation of empirical data and the application of acoustical propagation formulas.

FHWA HIGHWAY TRAFFIC NOISE PREDICTION MODEL FHWA-RD-77-108

To determine a project's operational noise levels associated with project-generated traffic CAJA utilizes the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108). The FHWA Model calculates the peak hour Leq and 24-hour Ldn or Community Noise Equivalent Level (CNEL) noise levels associated with traffic based on a particular reference set of input conditions, including site-specific traffic volumes, distances, speeds, and/or noise barriers.

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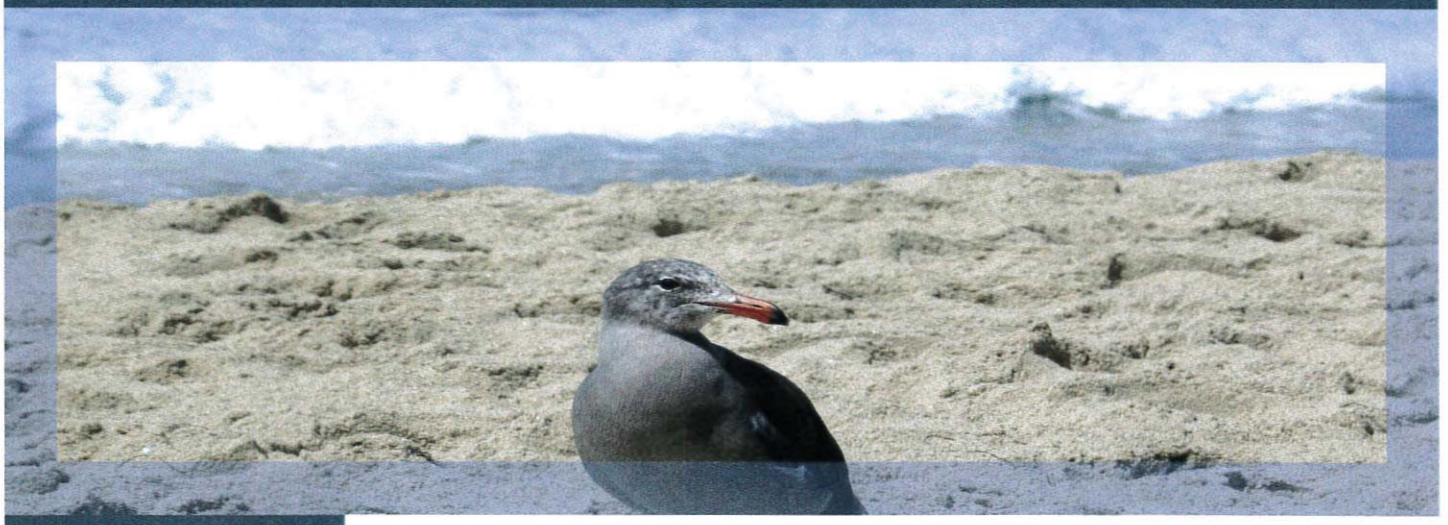

WATER SUPPLY ASSESSMENTS

CAJA provides assistance to applicants, lead agencies, and water suppliers in the preparation of water supply analyses required by state laws SB 610 and SB 221, which require projects exceeding certain size thresholds to include evaluations of long-term water supply availability in their environmental documents. While these assessments are required to be adopted by the water supplier to the project, CAJA can assist in preparing documentation that is consistent with the requirements of state law and associated case law.

CAJA understands the interactions between the sources of state water supplies, such as the Colorado River, State Water Project and Central Valley Project; regional cooperatives, such as the Metropolitan Water District of Southern California; local wholesalers; and local water purveyors, along with local water sources such as groundwater and recycled water. CAJA develops estimates of project-related water demand using appropriate local demand factors, along with cumulative demand within the service area of the water supplier, and analyzes the projected demand relative to local, regional, and state-wide water plans to assess the reliability of future supplies that would serve the project, including alternative sources of supply if necessary. CAJA also incorporates this information and analysis into the project's environmental document to provide the specific assessments and supporting documentation required to comply with state law and court decisions.

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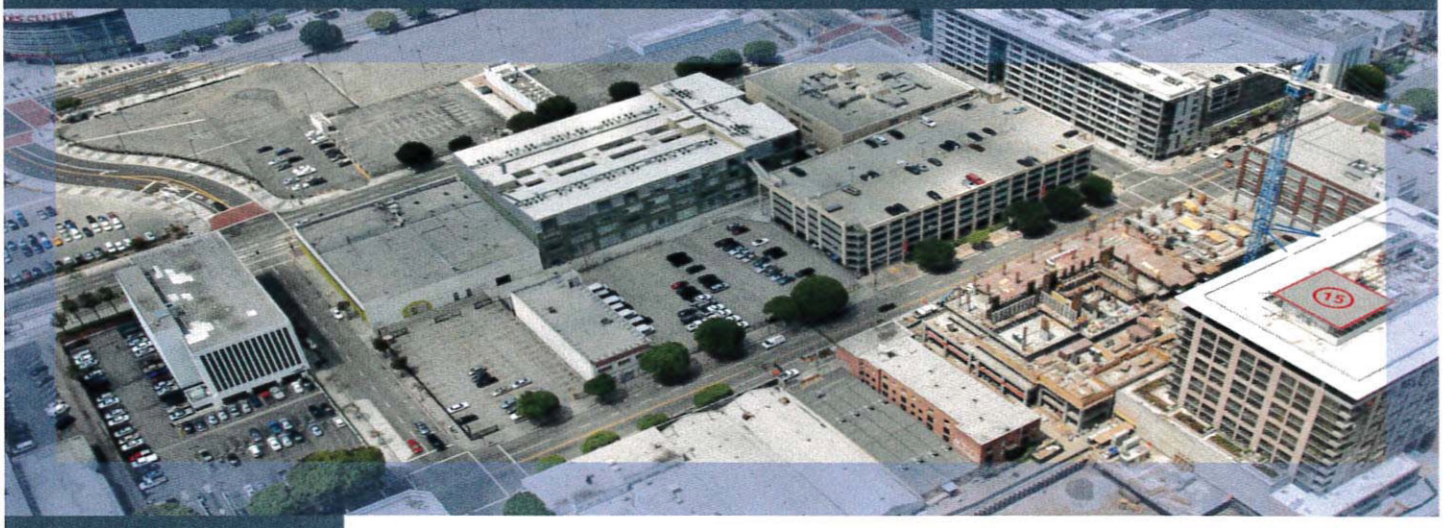
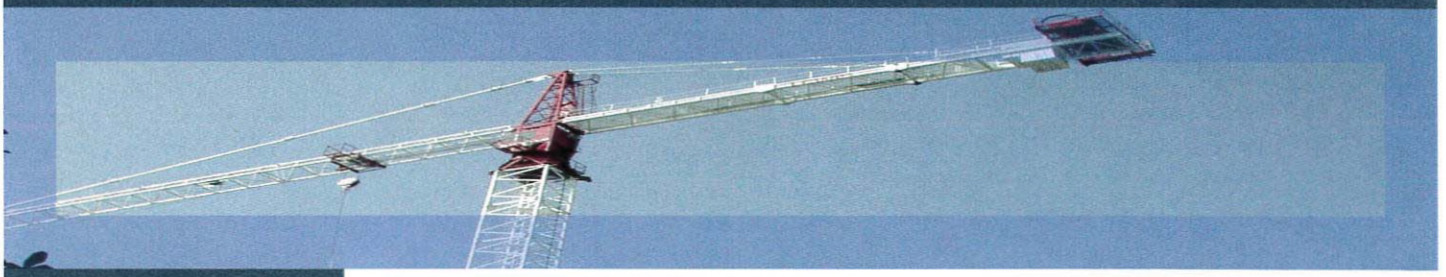


ENVIRONMENTAL CONSTRAINTS ANALYSES

Understanding the environmental and land-use constraints on a project site early in the planning stages of a project provides valuable insight to a site's limitations and opportunities, resulting in a cost-efficient and timely entitlement and permitting process. CAJA's staff and its technical and entitlement contract consultants are experienced in performing on-site surveys that identify and
map environmentally-sensitive resources, environmental and regulatory land-use/zoning constraints, and other regulated permitting processes that might restrict or cause modifications to the development of a parcel of land. Such assistance can help identify and address environmental and planning issues prior to the start of a project, allowing the lead agency to consider adjustments in the project design that would mitigate potentially significant environmental impacts that were previously unknown or overlooked.

CAJA offers environmental constraints analysis to both private applicants and public agencies.

CAJA Environmental Services, LLC



ENVIRONMENTAL REVIEW PROJECT MANAGEMENT

The most important consultant function in the environmental review process is effective project management.

CAJA's project management approach is based on our understanding that each project presents a unique set of challenges based on the level of detail proposed in the project plans, available site-specific information, perceived public controversy, and pro-posed timing of project implementation. CAJA's overall approach to project management is based on clear communication. As the leader of the environmental team, CAJA communicates all project milestones, issues, and pending processes with project team members and City staff to ensure compliance with the schedule, scope of work, and budget.

CAJA's management approach allows regular interaction between the project team, lead agency staff, and the other consultants; and requires frequent information sharing among team members. This approach fosters efficient data acquisition and provides advance notice of environmental findings. Such participation minimizes environmental impacts and duplication of research efforts, improves the technical quality and accuracy of the environmental analysis, and ultimately assists in the preparation of a quality project design and therefore, a technically accurate environmental document.

CAJA reviews all project communications and technical reports in a timely fashion to ensure that issues are recognized early in the process and communicated to appropriate parties, and that an action plan is formulated for resolving issues. This ensures that the environmental review focuses appropriately on environmental issues of most controversy and importance, that all environmental review is conducted to the highest standards and considers all appropriate environmental thresholds, and that all client and public concerns are addressed appropriately. In this role, CAJA is also responsible for:

- Supervising technical consultants who pre-pare specialized technical studies;
- Coordinating with the lead agency; and
- Facilitating communication between agencies, the project development team (including the applicant, attorney, architect, et al.), and all consultants.

CAJA is recognized for the effective execution of these responsibilities, which ultimately determines the schedule, cost, and legal adequacy of the environmental review process for any project.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

MARTIN EXPO TOWN CENTER EIR

CLIENT: Philena Properties, L.P.

LEAD AGENCY: City of Los Angeles

CAJA prepared the EIR for the Martin Expo Town Center Project. The Project proposes the removal of all existing structures and the construction of approximately 807,200 square feet of new development (approximately 707,801 net new square feet) with an FAR of 3.91:1. The Project proposes the development of 516 residential units (508,200 gross square feet), 99,000 square feet of retail floor area (consisting of a 50,000-square-foot grocery store, 40,000 square feet of general retail use, and 9,000 square feet of restaurant uses), 200,000 square feet of creative office floor area, and enclosed subterranean parking.

JEFFERSON AND LA CIENEGA EIR

CLIENT: CP V Cumulus, LLC.

LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Jefferson and La Cienega Project. The Project consists of the demolition of an existing office building, accessory structures, and four light industrial structures (approximately 63,313 square feet), two existing radio tower structures, and the development of an approximately 1,900-000-square-foot transit-oriented, mixed-use development. The Project includes approximately 1,218 multi-family residential units (1,600,000 square feet of residential floor area) and 300,000 square feet of commercial floor area on the lower ground floors, and a total FAR of 3.9:1. The commercial space would include 200,000 square feet of office space, 50,000 square feet of grocery store, 20,000 square feet of restaurant space, and 30,000 square feet of general retail. The height would be 320 feet for the tower portion of the Project (480,000 square feet), and 110 feet for the podium buildings. Parking would be provided within a combination of above ground and subterranean levels and would comply with LAMC requirements.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

NoHo WEST EIR

CLIENT: MGP XI-GPI Laurel Plaza, LLC

LEAD AGENCY: City of Los Angeles

CAJA is preparing the EIR for the NoHo West Project. The Project includes the redevelopment/reuse of the Project Site with a mix of commercial, retail and residential land uses. Approximately 16.44 acres (or 716,310 square feet) of the Project Site fronting Laurel Canyon Boulevard and Oxnard Street and near the 170 Freeway would be devoted to commercial use, with new interior access ways and private streets added for circulation. Approximately 8.26 acres (or 359,942 square feet) of the Project Site fronting Radford Avenue and Erwin Street would be developed with multi-family residential units. The Project includes the demolition of the existing 90,000-square-foot office building at the corner of Laurel Canyon and Erwin Street and the 10,000-square-foot Macy's annex building, as well as the removal of an approximately 20,000-square-foot portion of the existing Macy's building. The existing main Macy's building would be expanded and re-used for approximately 500,000 square feet of office uses. The Project also involves the development of the remainder of the Project Site with approximately 300,000 square feet of commercial uses, as follows: approximately 142,513 square feet of retail land uses, 48,687 square feet of restaurant land uses, 40,000 square feet of health club/ gym, and 68,800 square feet of cinema uses (with 1,750 seats). The Project also includes the development of two residential buildings fronting on Radford Avenue and Erwin Street containing a total of 742 residential units.

LOS ANGELES COLISEUM EIR

CLIENT: Los Angeles Memorial Coliseum Commission

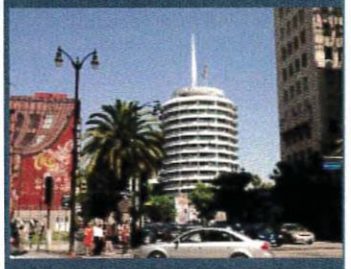
LEAD AGENCY: Los Angeles Memorial Coliseum Commission

CAJA prepared an EIR for the renovation of the Los Angeles Memorial Coliseum to conform with the generally accepted standards of design for National Football League (NFL) stadiums, under the objective of enabling the Coliseum Commission to acquire and maintain an NFL franchise in the City of Los Angeles. Proposed renovations to the Coliseum included reducing the seating capacity for professional and college football games, from the existing level of 92,500 to approximately 68,000 for NFL games and approximately 78,000 for collegiate football games. The project also included the addition of 175 luxury suites and a club level of 15,000 premier seats, along with renovations to portions of the 27.4-acre project site surrounding the Coliseum structure itself. The Coliseum is a prominent landmark in the history of the City of Los Angeles; the stadium hosted the 1932 and 1984 Olympic Games, and has been the home of numerous Los Angeles sports teams including the University of Southern California Trojans, the UCLA Bruins, the Los Angeles Rams and Raiders, the Los Angeles Dodgers, and Express and Xtreme football teams. One of the primary goals of the project was to renovate the Coliseum while simultaneously retaining and restoring as much of the existing Coliseum façade, bowl geometry, and seating areas as physically and practically possible, within the constraints of operational, programmatic, and historic restoration guidelines.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.



MILLENNIUM HOLLYWOOD EIR

CLIENT: Millennium Hollywood, LLC
LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Millennium Hollywood Project. The Project includes the construction of approximately 1,052,667 net square feet of new developed floor area. The historic Capitol Records Building and the Gogerty Building are within the Project Site. These historic structures would be preserved and maintained and are operating as office and music recording facilities under long term lease. Including the existing approximately 114,303 square-foot Capitol Records Complex, the Project would include a maximum of approximately 1,166,970 net square feet of floor area resulting in a 6:1 Floor Area Ratio averaged across the Project Site. The Project would also demolish and/or remove the existing approximately 1,800 square foot rental car facility. The Project would develop a mix of land uses, including some combination of residential dwelling units, luxury hotel rooms, office and associated uses, restaurant space, health and fitness club uses, and retail uses.

CASDEN SEPULVEDA EIR

CLIENT: Casden West LA. LLC
LEAD AGENCY: City of Los Angeles

CAJA prepared the EIR for the Casden Sepulveda Porject. The Project includes a mixed-use commercial and residential development, with commercial access along Pico and Sepulveda Boulevards and residential access along Sepulveda and Exposition Boulevards. Part of the Metro railroad easement at the southern portion of the site along Exposition Boulevard between Sepulveda Boulevard and Sawtelle Boulevard is planned for use as rail-line-related infrastructure associated with Phase II of the Metro's Exposition Light Rail Transit Line (the "Expo Line"). The Development Project would provide Expo Line passengers with pedestrian access to both existing and planned bus stops on both Pico and Sepulveda Boulevards. The Development Project would include a total of approximately 266,800 square feet of retail commercial floor area and 538 residential units (of which 59 would be senior-affordable units), including 56 studios, 262 one-bedrooms, 201 two-bedroom units, and 19 three-bedroom units (approximately 518,764 residential square feet). The Development Project would provide a total of approximately 2,029 parking spaces combined for residential, commercial, and guest use, in compliance with Code requirements. These parking stalls would be provided in up to five subterranean parking levels located below the development.

Add Area Project Description:
The Proposed Add Area Project includes re-designation of three parcels from Light Industrial and Public Facilities to Community Commercial.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

INGLEWOOD FOOTBALL STADIUM EIR

CLIENT: Hollywood Park, Incorporated

LEAD AGENCY: City of Inglewood

The City of Champions Revitalization Initiative (Initiative) would authorize the owners of the property at the former Hollywood Park Race Track to develop either the currently approved Hollywood Park Specific Plan project (Existing Project) or a new alternative project (Stadium Alternative) that would incorporate a multi-purpose stadium with fixed seating capacity of up to 80,000 for professional sports, including football and soccer, as well as concerts, and other entertainment uses into the previously approved Hollywood Park Project. While the stadium could be utilized for a variety of events with varying levels of attendance, for the purposes of the City's analysis, a venue designed for professional football with 75,000 patrons was assumed based on expected actual attendance, which would be less than full capacity for the majority of events due to unused tickets. The Stadium Alternative would be located on approximately 298 acres that encompass the site of the former Hollywood Park Race Track (the same site analyzed in the 2009 EIR and 2014 EIR Addendum) and 60 additional acres of existing surface parking north of the former track (Northern Parcel), which is located between Arbor Vitae Street and Pincay Drive and east of Prairie Avenue. The initiative would also authorize the construction of an approximately 6,000-seat entertainment venue, and additional retail, office, and business uses. The Stadium Alternative project, as described in the Initiative, would allow the City to continue its legacy of providing the region with world-class sports and entertainment by permitting the construction of a state-of-the-art, energy-efficient stadium and an entertainment district, which would provide the City with a unique ability to attract a National Football League (NFL) franchise to Southern California, as well as other regional, national, and international sporting events. The initiative process is being utilized by proponents because construction of the original project is already underway and to the extent a stadium is to be incorporated into theproject, it would need to be approved by the end of the year.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

PONTE VISTA EIR

CLIENT: BDC Ponte Vista Partners, LLC
LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Ponte Vista Mixed Use Project in the San Pedro area of the City of Los Angeles. The project site is located at the former U.S. Navy San Pedro Housing complex, a 61.5-acre property on Western Avenue south of Palos Verdes Drive North. Adjacent land uses include the U.S. Navy's Defense Fuel Support Point (DFSP) to the north, Mary Star of the Sea High School to the east, multi-family residences to the south, and single-family residences in the City of Rancho Palos Verdes to the west (across Western Avenue). The project site is currently improved with 245 residential units, a community center, and a retail convenience facility that were constructed in 1962 by the U.S. Navy for the purpose of housing personnel stationed at the Long Beach Naval Shipyard.

Subsequent to the circulation of the Draft EIR, the project applicant proposed reductions to the original project. The revised project reduced the total number of units proposed from 2,300 to 1,950 (reducing the overall density to 32 units per acre). The revised project included 1,000 stacked townhomes and condominiums in 3-4 story buildings. Approximately 850 units would be restricted as senior housing. The remaining 100 units would be 3-story attached townhome units with private garages. The revised project set aside 370 units for sale to workforce households. The revised project continued to include a maximum of 10,000 square feet of retail uses, as well as the public park and private recreational amenities proposed by the original project (consisting of approximately 40 percent landscaped common areas). Like the original project, the revised project would redevelop 100 percent of the project site.

At the time the EIR was published, the Ponte Vista Project was the second largest housing project proposed in the City of Los Angeles (with the Playa Vista project being the largest). The Ponte Vista Project sparked highly publicized debate within the San Pedro community and the adjacent City of Rancho Palos Verdes, with the primary points of contention being traffic impacts on Western Avenue and land use consistency (the project site is zoned R1 and the Project's proposed density is R3). The CAJA team faced further challenges when, during preparation of the Draft EIR, the project site was chosen as a preferred site for a high school by the Los Angeles Unified School District (LAUSD later abandoned its proposal during preparation of the Final EIR). 107 comment letters were received on the Draft EIR, amounting to a total of 1,655 individual comments.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

VERDUGO HILLS GOLF COURSE PROJECT EIR

CLIENT: Snowball West Investments

LEAD AGENCY: City of Los Angeles

CAJA is currently preparing an EIR for the proposed Verdugo Hills Golf Course project, located in the Sunland Tujunga community of the City of Los Angeles. The approximately 58-acre project site is an irregularly shaped property that is roughly bounded by Tujunga Canyon Boulevard to the east and La Tuna Canyon Road to the south. Approximately 25 acres of the project site are currently occupied by the Verdugo Hills Golf Course, a driving range, a surface parking lot, and other supporting uses. Single-family homes are to the north, and undeveloped land is to the west. The Foothill Freeway (Interstate 210) is located to the south of the project site, just beyond La Tuna Canyon Road.

The project proposes to demolish the existing golf course and supporting uses, subdivide the property and subsequently develop 229 four- and five-bedroom, two-story homes, with a density of approximately 3.93 units per acre. The residential units are to be located principally on the former site of the golf course and driving range, along with a currently undeveloped strip of land along Tujunga Canyon Boulevard. The development would be a private community with gated access and private roads. Grading would be restricted to slopes of 15 percent or less; therefore, approximately 32 acres of hillside slopes with gradients steeper than 15 percent are proposed to be retained as open space. The project would require a change of zone from RA-1 and A1-1 to RD5-1 to permit the construction of the proposed homes.

Major environmental issues include impacts related to hillside development, aesthetics, air quality, biological resources, cultural resources, hazards, hydrology, land use, noise, public services, traffic and transportation, recreation, and utilities and service systems.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

PARK FIFTH EIR

CLIENT: MacFarlane Partners

LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Park Fifth Project. The project includes the construction of 615 residential units and 16,968 square feet of commercial uses with a total floor area of 588,091 square feet. The revised project consists of a 241-foot, 24-story mixed-use building (referred to as the "Tower") with 300 residential units and approximately 10,961 square feet of commercial uses and a 7-story, 98-foot 10-inch mixed-use building (referred to as the "Mid-Rise") with 315 residential units and approximately 6,007 square feet of ground floor commercial uses above a semi-subterranean parking podium. The revised project will provide 657 parking spaces.

The entitlement request includes a Conditional Use to allow an FAR averaging across the project site within a Unified Development, a Variance to allow 545 standard parking stalls in lieu of the required 615 standard stalls for the residential use, a Variance to permit 88 trees in lieu of the required 154 trees for 615 residential units, a Zoning Administrator's Adjustment to waive the transitional height requirement for a C Zone property located within 100-feet of an OS Zone (Pershing Square), and a Site Plan Review for the development of a mixed-use project with 615 dwelling units.

MALIBU RACQUET CLUB EXPANSION MND

CLIENT: 94596 Malibu Racquet Club, LLC & North Broadway Ventures

LEAD AGENCY: City of Malibu

CAJA prepared the MND for the Malibu Racquet Club Expansion Project. The project includes the demolition of the existing single-family residence, construction of a new tennis pavilion, four additional tennis courts, yoga studio, walkways and additional parking spaces. Consistent with the City's General Plan, LCP, and sound planning practices, the Project will consolidate existing Racquet Club activities with the eastern portion of the overall Project Site, in order to preserve a usable internal open space design while maintaining required City setbacks from nearby residential and commercial properties. The expansion and upgrade to the existing tennis club would involve the creation of an additional four tennis courts (two clay and two hard courts) to the immediate east of the existing facility. The new tennis courts would allow for a tournament setting with ADA compliant access. Also, roughly 19,269 cubic yards of exempt grading and 2,751 cubic yards of non-exempt grading is proposed in order to allow the placement of the courts on an existing east sloping property. Exempt grading consists of remedial, understructure, and safety grading quantities. Additionally, parking would be provided on-site and to the east of the newly proposed courts.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.

BRADLEY LANDFILL AND RECYCLING CENTER MASTER PLAN EIR

CLIENT: Waste Management, Inc.

LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Bradley Landfill Transition Master Plan, which consists of two phases: (1) a proposed increase in the presently permitted height of the landfill to continue operations at the levels allowed under current permits; and (2) implementation of a transfer station operation within the current landfill site. The purpose of the Bradley Landfill Transition Master Plan is to provide for an orderly transition of the existing landfill site from an active landfill to a transfer station operation that will receive solid waste for disposal at other landfills. Under Phase I of the Bradley Landfill Transition Master Plan, the applicant requests to increase the maximum height of the landfill by 43 feet to a maximum height of 1,053 feet above mean sea level (msl). This increase in height would allow the landfill to continue operating at its current level of activity until its established closure date. On or before the established closure date, the applicant proposes to convert the existing landfill operation into a transfer station where solid waste loads are received, consolidated, and transported to other local or regional landfill facilities.

LAAFB LAND CONVEYANCE, CONSTRUCTION AND DEVELOPMENT PROJECT EIS/EIR

CLIENT: SAMS Venture, LLC

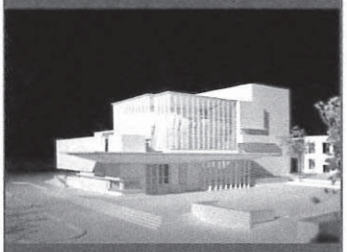
LEAD AGENCY: US Air Force, US Department of Housing & Urban Development, City of El Segundo & City of Hawthorne

CAJA prepared an EIS/EIR for a series of actions related to the possible conveyance, development, and use of four properties currently belonging to Los Angeles Air Force Base (LAAFB), which are referred to as Area A, Area B, the Lawndale Annex, and the Sun Valley Property. LAAFB houses several commands which encom¬pass functions related to research, development, and the procurement of military space systems. Under the proposed concept, Area A, the Lawndale Annex, and the Sun Valley Property would be conveyed to a private developer (a partnership of Kearny, Morgan Stanley Real Estate Fund IV, and Catellus) in exchange for constructing new buildings for the Air Force on Area B. The proposed project may also include the use of federal or State development incentives, including but not limited to: Brownfield grants, lease financing and certificates of participation, Mello-Roos special tax bonds, Base Retention grants, Infrastructure Financing Districts, tax-based incentive agreements, redevelopment funds, and/or other similar financial incentives.

CAJA Environmental Services, LLC

PROJECTS

Following are representative samples of CAJA's extensive project experience.



SANTA MONICA COLLEGE MADISON THEATER EIR

CLIENT: Santa Monica College

LEAD AGENCY: Santa Monica College

CAJA prepared an EIR for the Santa Monica College Madison Theater Project, which involves the construction and operation of a state-of-the-art, 500-seat theater facility for instruction and performances. The addition of the theater would be the catalyst in transforming the Madison Campus into the Madison Performing Arts Center. The design is intended to create a recognizable identity for the Madison Performing Arts Center, and to create a prized cultural venue for Santa Monica College students as well as members of the surrounding community. The project primarily consists of constructing the new performance theater, converting the existing unused school auditorium into a classroom rehearsal hall, and resurfacing and redesigning the surface parking lot.

METRO UNIVERSAL PROJECT EIR

CLIENT: Thomas Properties

LEAD AGENCY: City of Los Angeles

CAJA prepared an EIR for the Metro Universal Project located in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area of the City of Los Angeles. The project site is generally bound by Bluffside Drive to the north and west, Lankershim Boulevard to the east, and Ventura Boulevard to the south and west. Campo de Cahuenga Way and the Hollywood Freeway bisect the project site at the central and southern portions of the site, respectively. The existing uses on the project site included operation of a transit/transportation hub associated with the Universal City Metro Red Line Station. The project proposed the development of approximately 1.47 million square feet of new commercial and possible residential uses in two phases. Phase 1 included a 655,200 square-foot office and a 315,000 square-foot media production complex with up to 1,929 parking spaces, and a separate parking garage with up to 1,780 parking spaces, of which 800 were designated for use by Metro patrons and 25 for patrons of the Campo de Cahuenga historic site. Phase 1 also included up to 25,000 square feet of retail/restaurant facilities. Phase 2 included a 489,100 square-foot office building or a mixed-use hotel/residential building comprised of 400 residential units, 300 hotel rooms and ancillary meeting rooms, restaurant/lounge areas, spa space, and residential amenities. Phase 2 included the provision of up to 1,467 parking spaces. The project also included new bus drop-off, transfer, and layover facilities associated with the Metro Red Line station. Development of Phase 1 occurred on Sites A, B; Sites D and E were to be restriped to accommodate additional spaces for use as park and ride facilities.

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EXHIBIT 4

Memo

To: Ryan Luckert

From: Noah Tanski, Douglas Kim

CC:

Date: July 26, 2017

Re: Peer Review – New Beatrice West Noise Analysis

This memo summarizes our peer review of the noise analysis in the Draft Initial Study analysis dated May 17, 2017 for the New Beatrice West project.

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).

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-1 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 L_{eq}, 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.[2]

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

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

2 It should be noted that the California Department of Transportation (Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013) 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 far 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."

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 placrd the discretionary authority of who decides what constitutes as "reasonable measures" into the hands of the project itself.

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

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 L_{eq}; 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.

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 multi-family residential receptor located 50 feet south of the project site to experience a constructed-related noise level of 89.0 dBA L_{eq}, 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.

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 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

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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 SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.

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

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 L_{eq} at a distance of 50 feet; concrete pump trucks, 74.8 dBA L_{eq}. 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 L_{eq} 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 L_{eq} 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.

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.

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

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5 https://www.fhwa.dot.gov/Environment/noise/traffic_noise_model

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, multi-family 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 Westlawn 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.

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 on-site construction noise alone would exceed this threshold, even without considering the addition of off-site noise from construction vehicles.

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.

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).

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 groundborne 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.

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

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 events" are defined as fewer than 30 vibration events of the same source per day.

Douglas Kim, AICP
Principal

Education

B.A., Economics and City & Regional Planning, University of California, Berkeley, CA

Experience and Current Responsibilities

Mr. Kim serves as a project manager and technical analyst for a variety of projects. He specializes in transportation, air quality, and land use planning, as well as environmental review and analysis. Mr. Kim has prepared and reviewed CEQA and NEPA documents for major land use and transportation projects and has authored guidance documents on how to perform transportation and circulation studies and air quality analyses. He has managed preparation of air quality plans, developed air quality regulations, and performed urban land use and growth analyses. Mr. Kim has over twenty years of policy and technical experience in developing long- and short-range multi-modal transportation plans, including development of performance measures, performing alternatives analyses, and managing technical modeling.

Relevant Project Experience

- **City of Ceres, Mitchell Ranch Wal-Mart Supercenter, Air Quality Analysis.** Mr. Kim oversaw the climate change impact analysis for the proposed 229,135 square foot Supercenter. Key issues included the project-level threshold of significance and the quantitative methodologies for estimating CO2e emissions from the various source categories associated with a larger warehouse retail facility.

- **City of Paso Robles, Golden Hills Plaza Project, Air Quality Analysis.** Mr. Kim prepared the air quality analysis for the Golden Hills Plaza project, which includes over 300,000 square feet of commercial retail, restaurant, and other uses in San Luis Obispo County. Analysis included use of URBEMIS and EMFAC on-road emission factors to project project-related emissions.

- **City of Rancho Cordova, International Drive Extension, Air Quality Analysis.** Mr. Kim oversaw the air quality analysis and CO dispersion modeling to analyze the impacts of extending a major arterial, International Drive, through a growing community with sensitive receptors and a new bridge over Folsom South Canal.

- **County of San Luis Obispo, Conservation Element and EIR.** Mr. Kim is overseeing the development of the air quality policies for the San Luis Obispo County General Plan Conservation Element update and the air quality analysis for the associated EIR. PMC's work on this project involves the development of progressive land use-related policies that are intended to reduce criteria pollutant emissions and reduce the County's impact on climate change by reducing its carbon footprint.

- **South Coast Air Quality Management District, Air Quality Handbook.** Mr, Kim served as co-authored of AQMD's landmark CEQA Guidelines that provide guidance for performing air quality and transportation impact analyses for environmental studies. This included screening guidance for CO analysis and detailed CALINE modeling protocols.

- **Monterey Bay Unified Air Pollution Control District, Air Quality Guidelines**. Mr. Kim authored the District's CEQA Guidelines for environmental review in the three-county North Central Coast, managed CEQA environmental analyses for District regulations and air quality analyses throughout the air basin, and developed the agency's transportation/air quality conformity regulations for Monterey, Santa Cruz, and San Benito Counties. He also served on a CAPCOA Statewide committee that developed the Air Resources Board's URBEMIS model for estimating air quality impacts of land use projects.

- **City of Cloverdale, General Plan EIR**. Mr. Kim developed an EIR air quality analysis for the comprehensive update of Cloverdale's General Plan, an urbanizing community in northern Sonoma County. This includes an analysis of construction emissions expected from representative construction of land use and transportation projects.

- **City of Los Angeles, Trizec Hahn Office Development, EIR.** Mr. Kim managed the air quality analysis of a 68,000 square-foot office and retail building in the Warner Center area of Los Angeles. Air quality modeling of CO impacts near major north-south and east-west arterials in the West San Fernando Valley was performed using CALINE. Project emissions were calculated using EMFAC and URBEMIS models.

- **San Luis Obispo Council of Governments, Regional Transportation Plan EIR –** Mr. Kim oversaw the initial development of the EIR for a Program-Level EIR for the 2010 Regional Transportation Plan. This document will assess the direct and indirect environmental impacts of a 25-year multi-modal transportation plan that includes roadway and transit capital improvements, funding for roadway, transit, and non-motorized programs, funding alternatives, and smart growth scenarios. Key issues of concern include the impacts of the RTP on global climate change and how to address impending SB 375 requirements.

- **County of San Luis Obispo, Greenhouse Gas Inventory –** Mr. Kim assisted in the comprehensive assessment of greenhouse gases in the unincorporated county jurisdiction. This included assessment of motor vehicle emissions from current development patterns, as well as GHG emissions from motor vehicles, land use, energy consumption, water consumption, and solid waste-related activities.

- **City of San Carlos, Climate Action Plan** – Mr. Kim helped develop the technical protocols for analyzing the motor vehicle and other area source GHG emissions inventory for the City. He also provided guidance on the development of CAP policies for motor vehicles, land use, energy consumption, water conservation, solid waste reduction programs, and other strategies designed to reduce the City's carbon footprint over time.

- **Southern California Association of Governments, Regional Transportation Plan EIR –** Mr. Kim has helped develop and review the pending Program EIR for the 2008 Regional Transportation Plan. This analysis includes the assessment of air quality and climate change impacts from the implementation of a multi-billion dollar multi-modal transportation system in Los Angeles, Orange, Riverside, Ventura, Imperial, and San Bernardino counties.

Previous Experience

- **Director, Transportation and Air Quality Planning, PMC –** Mr. Kim oversaw the development of transit and multi-modal transportation plans for public agencies throughout the State. This included a spectrum of projects including a Strategic, Long Range Plan to maintain mobility through the I-8 Corridor connecting San Diego and Imperial counties to short-range transit plans for the unincorporated areas of Los Angeles County. He also oversaw numerous traffic impact analyses for projects throughout California using TRAFFIX and other travel demand models. Mr. Kim also oversaw the air quality analysis work for the firm, preparing emissions and dispersion modeling analyses for development projects, transportation infrastructure improvements, and other developments throughout the State. He also managed the Environmental Impact Reports for transportation plans, including the Sonoma County Transportation Authority, San Luis Obispo Council of Governments, and Assocation of Monterey Bay Area Governments.

- **Director, Long Range Planning, Los Angeles County Metropolitan Transportation Authority.** Mr. Kim oversaw the long-range and regional transportation planning department with an annual operating budget of $2 million. He developed the Long Range Transportation Plan for Los Angeles County that lays out a 25-year plan of transportation priorities for the agency. Mr. Kim also oversaw the state-mandated Congestion Management Program for 89 cities in Los Angeles County that assured $93 million annually in state sales tax. He directly reviewed traffic and transportation

analyses, oversaw input into the transportation and financial analysis models, managed local governments' compliance with transit service and planning requirements, and ensured conformance with CEQA requirements. He also managed the agency's air quality analysis and environmental review programs, as well as emission reduction credit trading programs. He secured funding for the Freeway Service Patrol, rideshare programs, and other operational programs. At the regional level, he served as direct liaison to regional agencies, including Southern California Association of Governments, Regional Transportation Agencies Coalition, and South Coast AQMD. In these capacities, he also served in several leadership positions as Chair of the Regional Transportation Plan Technical Advisory Committee, AB 2766 Discretionary Air Quality Fund Committee, and Southern California Transportation/Air Quality Conformity Working Group. Mr. Kim oversaw the agency's Mobility 21 planning functions, including Smart Growth Partnership, an effort to merge land use and transportation planning objectives to promote transit-oriented development.

- **Board Member Consultant, South Coast Air Quality Management District.** Mr. Kim served as policy and technical advisor to AQMD Board Members on air quality issues for 61 cities in Los Angeles County. His responsibilities included policy and technical advisory function for AQMD Legislative, Administrative, Stationary Source, Technology, and Mobile Source Committees. He oversaw technical review of stationary and mobile source air quality issues and rulemaking. He managed and responded to constituent requests from member cities and private sectors.

- **Transportation and Air Quality Planner, Monterey Bay Unified Air Pollution Control District.** Mr. Kim was agency lead for transportation, land use, and air quality analyses. He performed technical traffic and air quality analyses on regionally significant projects. He authored the District's CEQA Guidelines for environmental review in the three-county North Central Coast, managed CEQA environmental analyses for District regulations and air quality analyses throughout the air basin, and developed the agency's transportation/air quality conformity regulations for Monterey, Santa Cruz, and San Benito counties. Mr. Kim served as a member of the Fort Ord Reuse Authority Advisory Committee with land use and public works advisory authority over the master plan for redevelopment of 28,000-acre former military base. He also served on a CAPCOA statewide committee that developed the Air Resources Board's URBEMIS model for estimating air quality impacts of land use projects.

- **Transportation and Quality Planner, South Coast Air Quality Management District.** Mr. Kim served as agency lead for land use and transportation policy and technical analyses. He also was AQMD representative on Orange County planning committees, including the Congestion Management Program Advisory Committee. He co-authored AQMD's landmark CEQA Guidelines for performing environmental analyses. Mr. Kim managed technical planning analyses for the Long Range Plan and $150,000 consultant contracts to develop methodologies for quantifying impacts of transportation control measures. He also served as AQMD representative on SCAG technical committees for the Regional Transportation Plan and Regional Transportation Improvement Program.

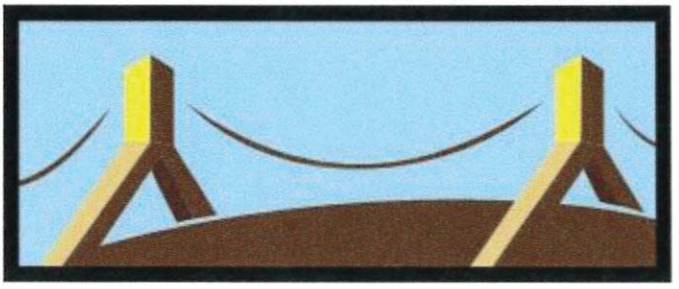
Professional Affiliations

Member, American Planning Association

Member, American Institute of Certified Planners

Chairman, Planning Commission, City of Redondo Beach

Member, Redondo Beach Green Task Force



DOUGLASKIM+ASSOCIATES,LLC

Douglas Kim + Associates, LLC (DKA) provides comprehensive policy and technical analysis services in the areas of transportation, transit, and air quality planning. DKA also performs traffic, air quality, and noise analyses for CEQA and NEPA environmental documents. The company's services include:

Transportation Planning and Analysis

- Transportation plan
- Traffic impact analyses
- Traffic mitigation and control plans

Transit Planning and Analysis

- Transit needs assessments
- Transit restructuring plans
- Line-by-line analysis
- On-board surveys

Air Quality Policy and Analysis

- Air quality mitigation plans

- Climate Action Plans
- Emissions analysis
- Climate change analysis
- Dispersion modeling
- Health Risk Assessments

Noise and Vibration Analysis

- Ambient noise monitoring
- Noise modeling and analysis of transportation, stationary, and area sources
- Vibration modeling and analysis of transportation, stationary, and area sources

Environmental Analysis

- Preparation of CEQA/NEPA documents
- EIR/EIS
- Negative Declarations, Mitigated Negative Declarations
- Development of Mitigation Monitoring Programs

Douglas Kim + Associates, LLC is both a certified Small Business Enterprise (SBE) and a certified Minority-Owned Business Enterprise (MBE). Mr. Kim is also certified by the American Institute of Certified Planners (AICP), #011509.

Douglas Kim, AICP, Principal, specializes in transportation, air quality, and land use planning, as well as environmental review and analysis. Mr. Kim has prepared and reviewed CEQA and NEPA documents for major land use and transportation projects and has authored guidance documents on how to perform transportation and circulation studies and air quality analyses. He has over twenty years of policy and technical experience in developing long- and short-range multi-modal transportation plans, including development of performance measures, performing alternatives analyses, and managing technical modeling. Mr. Kim has managed preparation of air quality plans, developed air quality regulations, and performed urban land use and growth analyses.

EXHIBIT 5

Kimley»Horn

TECHNICAL MEMORANDUM

To: Ryan Luckert
CAJA Environmental Services, LLC

From: Sri Chakravarthy, P.E., T.E.
Kimley-Horn and Associates, Inc.

Date: May 31, 2017

Subject: NSB 12575 Beatrice Street Traffic Study Peer Review

Kimley-Horn reviewed the Traffic Impact Study for 12575 Beatrice Street Office Project (NSB Project) dated July 11, 2016, which was prepared by Linscott, Law & Greenspan, Engineers (LLG). This brief review was completed for Karney Management. The NSB project is expected to generate 1,946 daily trips with 275 AM peak hour trips and 334 PM peak hour trips. Primary access is being proposed on Jandy Place, which is a two-lane local street cul-de-sac with very limited ability to handle high vehicular traffic.

The study indicates that 75% of the project traffic will be utilizing Jandy Place. It is also understood that all the project delivery and truck access will be off Jandy Place in addition to the proposed food trucks area. It is anticipated that Jandy Place will experience severe congestion during the AM and PM peak periods, potentially creating a hazardous situation including possibly blocking access to emergency vehicles.

A thorough analysis of this short street segment, as well as Beatrice and Westlawn, should be completed to understand if there are any adverse effects from the proposed project on traffic, pedestrian, and emergency vehicle access. Below is a summary of the traffic study.

1. Study Intersections – The study included analysis of internal intersections adjacent to the project site as well as the following additional intersections.

- Lincoln Boulevard / Marina Pointe Drive – Maxella Avenue
- Lincoln Boulevard / SR-90 Ramps
- Mindanao Way / SR-90 WB Ramps
- Mindanao Way / SR-90 EB Ramps
- Westlawn Avenue / Bluff Creek Drive

2. NSB site plan shows 3 proposed driveways.

- Per NSB project site plan, the driveway along Beatrice Street is approx. 100' due west of Westlawn Avenue. There is no driveway at Beatrice/Westlawn.
- The driveways along Jandy Place seem to be directly opposing the proposed driveway for Jandy project. They do show that these driveways are the primary access driveways (75% of their project traffic uses this driveway to enter and exit site)
- There is a service driveway at the end of their site on Jandy within the cul-de-sac area but no additional information such as frequency of service vehicles, size of vehicles, etc has been included.

3. Signal Warrant – NSB traffic study includes four hour and peak hour warrants. The study indicates the following:

- At Jandy/Beatrice, peak hour warrant is met for Future plus Project conditions
- At Westlawn/Beatrice, four-hour warrant is met for Future plus Project conditions

4. Impacts – NSB study indicates significant project impacts at 3 study intersections. Proposed mitigation measure includes re-striping and signal timing improvements

- Westlawn/Jefferson
- Grosvenor/Jefferson
- Centinela/Campus Center Dr (Jefferson)

EXHIBIT 6

12575 BEATRICE STREET OFFICE PROJECT TRAFFIC IMPACT STUDY REVIEW LOS ANGELES - CALIFORNIA

Prepared for:

LUNA & GLUSHON
Encino, California

Prepared on:

October 13, 2017

COCO TRAFFIC PLANNERS, INC.

12575 BEATRICE STREET
OFFICE PROJECT TRAFFIC
IMPACT STUDY REVIEW
LOS ANGELES - CALIFORNIA

Prepared for:

LUNA & GLUSHON

Prepared on:

October 13, 2017

Prepared by:

COCO TRAFFIC PLANNERS, INC.
10835 Santa Monica Boulevard, Suite 202
Los Angeles, California 90025
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EXECUTIVE SUMMARY

A thorough and independent review of the traffic study prepared by Linscott, Law & Greenspan, Engineers for an office development project located at 12575 Beatrice Street, in Los Angeles, California was conducted by our firm. The review aimed at verifying the accuracy and consistency of the data used, the calculations, and the adequacy of the study's conclusions. In addition, the traffic generation factors used in the traffic study were verified. A detailed review of the technical appendices to the traffic study also was conducted.

Our review of the above mentioned traffic study showed that while the methodologies used are in line with widely accepted industry standards, the traffic study lacks some of the data and Exhibits required by the latest LADOT Traffic Study Policies and Procedures. A critical element, the Regional Traffic Distribution, is not provided, neither in an Exhibit format, nor in a text format. This makes it difficult to verify the traffic assignment used in the study, which is a critical element of the analysis. Virtually no description of the parking structure, supply, access, and internal circulation is provided in the report. This also contributes to the difficulty in verifying the rational of the traffic distribution and assignment used in the analysis.

We also found several inconsistencies in the evaluation of the traffic generation for the proposed project, and the volume/capacity calculations, which altered the real proposed project's traffic impacts. We estimate that a greater number of intersections may be significantly impacted by the subject development, as compared to those found by the LLG study. It is recommended that the subject LLG traffic study be revised to correct the inconsistencies found by our review.

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October 13, 2017

Ms. Kristina Kropp, Attorney
LUNA & GLUSHON
16255 Ventura Boulevard, Suite 1016
Encino, California 91436

Subject: 12575 BEATRICE STREET OFFICE PROJECT TRAFFIC IMPACT STUDY REVIEW - LOS ANGELES, CALIFORNIA

Dear Ms. Kropp,

As authorized, we have conducted an thorough review of the above mentioned traffic study, prepared on July 11, 2016 by Linscott, Law, and Greenspan Engineers (LL&G) for the office development project located at 12575 Beatrice Street, in Los Angeles, California. In addition, we reviewed an Addendum to the LLG Traffic Study, dated December 14, 2016, addressing a revised driveway and parking plan. The LL&G traffic study was reviewed with regard to the data used, the calculations performed to obtain the study's conclusions, the traffic generation factors used, the traffic distribution and other traffic related matters. This report contains the findings and conclusions of our study with necessary supporting data.

Project Description

The proposed project's site is located at 12575 Beatrice Street, in the City of Los Angeles, bounded by Jandy Place to the west, Beatrice Street to the south, and existing office buildings to its north and east sides. The site falls within the Coastal Transportation Corridor Specific Plan area of the City of Los Angeles.

The site currently is occupied by an office building with 23,072 square feet (sf) of floor area. Two driveways, one on Beatrice Street, and one on Jandy Place respectively provide vehicular access to the existing building. The proposed project consists of the demolition of the existing building, to replace it with a new office building with a net floor area of 199,500 sf.

Vehicular access to the new project will reflect the current layout, with one driveway on Beatrice Street, and two on Jandy Place. A parking garage will be provided on site, beneath the office building. Access to the street and upper levels of the parking garage will be provided by the driveway on Beatrice Street, and the southerly one on Jandy Place. The northerly Jandy Place driveway will provide access only for the subterranean levels of the garage. In addition, a separate driveway will be provided on

Jandy Place at the northern end of the site to be used by service vehicles. Ingress and egress movements will be allowed at all driveways. The Addendum reports that the proposed project has been revised to provide one additional driveway on Beatrice Street, for a total of two, along with the two previously planned for Jandy Place. It should be noted that no data is provided in the subject Traffic Study, nor in the Addendum about the existing, or the proposed parking supply. The project is planned to be built, and fully occupied by the year 2018.

Traffic Study Review And Analysis

Specific tasks, completed as part of this report, consisted of reviewing the LL&G Traffic Study dated July 11, 2016, as well as the Addendum dated December 14, 2016, with regard to the data used, the calculations performed to obtain the study's conclusions, the traffic generation factors used, the traffic distribution, along with the intersection capacity calculation procedures at the key intersections analyzed in the report, and other traffic related matters.

In general, while most of the methodologies used in the analysis are in line with widely accepted industry standards, we found inconsistencies in the evaluation of the traffic generation for the proposed project, and some of the volume/capacity calculations. In addition, some errors were found in the Volume/Capacity ratio calculations relative to some intersections. These inconsistencies allowed the formulation of conclusions that appear to be unreasonable, in view of the results associated with the traffic study. Based upon our review, we offer the following comments on the assumptions, methodologies and conclusions contained in the LL&G traffic study:

- **Project Description** - The LL&G study describes the existing and proposed site development however, there is no mention of the quantity of parking provided, or the allocation of parking stalls among the different parking levels. Similarly, no plan of the parking garage is provided. The Addendum to the Traffic Study does not expand on the proposed parking supply, or the layout of the revised parking facility. No parking plan is provided, or an analysis of the parking supply. Consequently, it is difficult to verify the LL&G assumptions about the site related traffic split between the various driveways. The Addendum reports the additional driveway on Beatrice Street, which should determine a 50/50 split between the Beatrice Street and the Jandy Place driveways, but no data about the parking facility or its supply. The site traffic assignment to the analyzed intersections, especially those adjacent or close to the project's site also is difficult to verify. In addition, since no plan is provided of the parking garage's layout, it is not possible to verify whether the garage has proper internal circulation, or if its design is reasonable. It is recommended that revisions be made to the traffic study, showing the plan of the parking garage, its capacity, and an analysis of the proposed project's parking needs, as compared to the actual parking supply.

It should be noted that on page 1 of the Addendum ti is reported that "*In addition, as vehicles currently utilizing the existing surface parking lot to be removed will be relocated to the Project's parking garage, the traffic volumes associated with the existing parking lot were added to the forecast Project-related volumes at the site driveways.*" It is not clear why the existing parkers would be added to the future ones, since the proposed office building will replace the existing development. Later in the Addendum, a discussion of the "Relocated Parking" describes that parking for the office building located at 12531 Beatrice Street will utilize the proposed project's parking. This is the first time this condition is described. A revised traffic study should address the subject shortcomings, and expand upon the additional office building's square footage, parking supply, current circulation, and any other information which may help clarify the operations of the new parking structure. It should be noted that the traffic associated with the proposed office building will create a significant number of trips, impacting the intersections of Jandy Place with Beatrice Street (side street Stop controlled), and Westlawn Avenue with Beatrice Street (Stop controlled). These are small two lane streets, and intersections, where the project's traffic will create potentially hazardous conditions, associated with the type of traffic control, visibility, speed limit. The additional traffic associated with the next door building will worsen the hazardous conditions that already will result from the major increase in traffic.

- **Related Projects Traffic** - The LL&G study indicates that 29 related projects, listed in Table 6.1 of the study, were under construction, or planned at the time the study was prepared. The table also reports the related projects addresses, land uses, sizes, as well as the traffic generated by each individual projects. However, there is no table showing how the traffic generated by these projects is calculated, i.e. the traffic generation factors used. This makes it very difficult to verify the accuracy of the calculations. This is significant, since the overall related projects' traffic generation is reported at about 9,200 and 11,300 vehicle trips during the AM and the PM peak hours respectively. A revised traffic study should address the subject shortcoming.

- **Related Projects Traffic Distribution and Assignment** - Once a project's regional traffic distribution has been evaluated, the traffic is assigned to the key intersections. Exhibits showing the traffic assignment, possibly by land use, make it possible for the reader to understand the pathways assumed by the traffic engineer. No data is provided by the LL&G report with regard to the related projects traffic distribution. Also, there is no mention of how their traffic has been assigned to the street system, and to the intersections analyzed. The study only provides exhibits showing the related projects' combined traffic volumes at the key intersections, both for AM and PM peak hour traffic conditions, which doesn't help much deciphering the routes used

by the related projects' patrons. Hence, it is impossible to verify the accuracy of the calculations, and ultimately of the report. A revised project's traffic report should provide a detailed related projects' traffic generation table, and exhibits showing the traffic assignment in terms of percentages of the traffic generated by the related projects.

- **Project Traffic Generation** - Table 7.1 of the LL&G study shows the proposed project's traffic generation. The calculations are based upon data provided by the Traffic Generation Manual of the Institute of Transportation Engineers (ITE) for the daily, and the morning peak hour factors, as well as by the Coastal Transportation Corridor Specific Plan for the evening peak hour. The table indicates that, the proposed project is expected to generate about 311 vehicle trips (274 inbound and 37 outbound) during the morning peak hour. The evening peak hour shows an estimated generation of 399 vehicle trips (68 inbound and 331 outbound). It should be noted that the ITE data is based upon thousands of traffic generation surveys. The analysis of those surveys establishes the relationship between the traffic generated by various land uses, and an "independent variable", normally the square footage of a development. The results of the subject analyses provide formulas, correlating the traffic generated, to the square footage of a given land use. When sufficient data is not available, the Manual only provides an average traffic generation rate. When both equations and rates are provided the formulas should be utilized since they are more accurate, and directly take into account the specific size of the land use. Basically, on a per unit basis (i.e. 1,000 sf), the traffic generated by a development varies with its total size. For instance, based upon the ITE equation (9th Edition), a 50 ksf office building is expected to generate 775 vehicle trips per day, which translates into a factor of about 15.5 trips per 1,000 sf. The same equation yields 1,313 daily vehicle trips for a 100 ksf, or a factor of about 13.13 trips per 1,000 sf.

  Besides the subject equations, the ITE also provides the average size of the independent variable. The weekday condition for General Office space, shows that the average size of the developments surveyed was 197 ksf. By "plugging" the average size among all of the sample surveys into the equation, a value of about 11.16 vehicle trips per 1,000 sf is obtained. This is very close to the Average Rate reported in the manual (11.03), and is the rate used by the LL&G traffic study. By using the average factor Linscott Law & Greenspan assumes that the proposed, and the existing office space generate traffic at the same rate as the average 197 ksf development, thus nullifying the effort of generating the equations in the first place. While the proposed project size is very close to the average size mentioned above, the existing building is much smaller (23,072 sf) therefore the average traffic generation factor is not appropriate. As stated above, the correct methodology is to use the equations, whenever available. It should be noted

that by using average rates, the proposed project shows a lower traffic generation than it would, if the correct procedure were employed.

The above argument also stands for the AM and the PM peak hours conditions. Table 1 shows a comparison between the two methodologies. Specifically, the proposed project, which the LL&G study calculated to generate about 311 vehicle trips (274 inbound and 37 outbound) during the morning peak hour, would actually generate about 330 vehicle trips (290 inbound and 40 outbound) during the morning peak hour, a higher volume. The evening peak hour shows an estimated generation of 399 vehicle trips (68 inbound and 331 outbound), calculated with the Coastal Transportation Corridor Specific Plan (CTCSP) peak hour factors. This volume instead would change to a lower 302 vehicle trips (51 inbound and 251 outbound), with ITE factors. Given that the ITE data is significantly more accurate than the "one factor fits all" CTCSP factors, it is recommended that a revised project's traffic report also applies the ITE equations to the proposed, as well as the existing project. The following example should be noted with regard to using the CTCSP factors: an 80 ksf office would generate about 224 trips during the PM peak hour (80 x 2.8), while a 110 ksf would generate 220 trips (110 x 2.0). Basically, these two buildings would generate the same quantity of traffic, in spite of the fact that one is about 40% larger than the other.

- **Project Traffic Distribution** - Figure 7.1 of the LL&G study is reported as showing the proposed project's traffic distribution. In reality the Figure shows the project's traffic assignment to the key intersections. No Figures showing estimates of the regional/directional, distribution of the site traffic are presented. Once the directional distribution of the site traffic is estimated, then the traffic can be assigned to the roadway system, and the key intersections, as Figure 7.1 of the LL&G study. Without the regional distribution Figure, it is very difficult to ascertain the correctness of the traffic distribution, and consequently, the accuracy of the traffic assignment. It appears that site traffic going to, and coming from the west was estimated at between 10 and 15 percent of the total traffic generated. This appears to be exaggerated, given the short distance between the site and the ocean, and the limited quantity of residential developments to the west of the site.

  About 13 percent of the inbound and outbound site traffic has been assigned to Westlawn Avenue. Of that, 3 percent is assumed to stop at the residential development right south of Jefferson Boulevard. Both these assignments appear to be significantly high, along with the 10 percent of the site traffic assignment to Bluff Creek Drive.

  Also, 10 percent of the site traffic has been assigned to the westbound on-ramp to the Hwy 90, off of Centinela Avenue, with the assumption that this traffic will go to Culver Boulevard (5%), and Mindanao Way (5%). Basically,

TABLE 1

PROJECT TRAFFIC GENERATION
12575 Beatrice Street Office Project Traffic Impact Study Review - Los Angeles

LAND USE	SIZE	UNIT	LAND USE CODE	AVERAGE DAILY TRAFFIC (1) TE Rate	AVERAGE DAILY TRAFFIC (2) Trip Ends	AM PEAK HOUR TE Rate (1) In	AM PEAK HOUR TE Rate (1) Out	AM PEAK HOUR Trip Ends (2) In	AM PEAK HOUR Trip Ends (2) Out	PM PEAK HOUR TE Rate (1) Out	PM PEAK HOUR Trip Ends (2) In	PM PEAK HOUR Trip Ends (2) Out
Site Project Per LL&G Study												
Proposed General Office	**199.500**	**KGSF**	710	11.03	2,200	1.373	0.187	274	37	0.340 1.660	68	331
Proposed Project Traffic Generation					**2,200**	**AM Peak = 311**		**274**	**37**	**PM Peak = 399**	**68**	**331**
Proposed Development Net Traffic Generation					**2,200**	*AM Total = 311*		**274**	**37**	*PM Total = 399*	**68**	**331**
Site Project Per ITE Data												
Proposed General Office	**199.500**	**KGSF**	710	11.12	2,219	1.467	0.200	293	40	0.26 1.26	51	251
Proposed Project Traffic Generation					**2,219**	**AM Peak = 333**		**293**	**40**	**PM Peak = 302**	**51**	**251**
Proposed Development Net Traffic Generation					**2,219**	*AM Total = 333*		**293**	**40**	*PM Total = 302*	**51**	**251**

Note: Traffic Generation factors per Institute of Transportation Engineers (ITE) Traffic Generation Manual 9th Edition.

1) TE Rate is the average number of Trip Ends generated per "SIZE" Unit (i.e. DU).

2) Trip End is a one-way vehicle movement entering or leaving the traffic generator.

this traffic is supposed to turn left on Jefferson Boulevard, travel east and turn left (northbound) on Centinela Avenue, onto the 90 Hwy, to exit on Culver Boulevard, and Mindanao Way. Should this traffic turn right onto Jefferson Boulevard (westbound), it would get to the same point on a 20% shorter route. Had the correct assignment have been used, the project's traffic impacts would have further deteriorated in the intersections located west of the site, and possibly trigger significant impacts. These inconsistencies should be cleared and/or corrected in the recommended proposed project's revised traffic study.

- The existing northbound traffic movements at the intersection of Westlawn Avenue and Jefferson Boulevard are not shown, both for the AM and the PM peak hours Figures 5-1, and 5-2, indicating that no northbound movements are allowed, or exist. The data, obtained from the traffic counts conducted on January 28, 2016, and provided by the City of Los Angeles Department of Transportation (LADOT), do not show any northbound volumes at the subject location. However, those movements are allowed, and exist. It appears that on the date of the count, January 28, 2016, that leg of the intersection was blocked to northbound traffic, possibly for construction south of Jefferson Boulevard. Consequently, additional traffic counts should have been conducted when the subject northbound leg was reopened. This is the first intersection that the site traffic impacts right out of the project site. Consequently, it is critical that this inconsistency be cleared and/or corrected in the recommended proposed project's revised traffic study.

- The intersections of Jefferson Boulevard with both north and southbound ramps to the I-405 has been calculated with a capacity of 1,200 vehicles per hour (vph) due to the fact that the intersections are closely spaced. However, the subject traffic signals are connected, and traffic movements are coordinated. Consequently, the correct capacity of 1,425 vph for three phase signals should be used.

* * * * * *

Summary And Conclusions

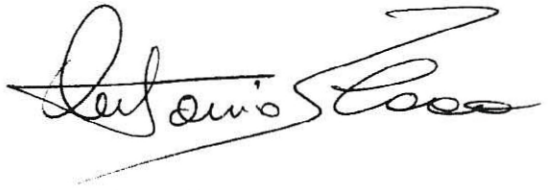
A thorough and independent review of the traffic study prepared by Linscott, Law & Greenspan, Engineers for an office development project located at 12575 Beatrice Street, in Los Angeles, California was conducted by our firm. The review verified the accuracy and consistency of the data used, the calculations performed to obtain the volume/capacity ratios presented, and the adequacy of the study's conclusions. In addition, the traffic generation factors used in the traffic study were verified. A detailed review of the technical appendices to the traffic study also was conducted.

Our review of the subject traffic study showed that while the methodologies used are in line with widely accepted industry standards, the traffic study does not provide some of the data required by the latest LADOT Traffic Study Policies and Procedures. Specifically, the lack of the Regional Traffic Distribution, both in a Figure format, and in a text format makes it difficult, if not impossible to verify the traffic assignment used in the study, which is a critical element of the analysis. We also found inconsistencies in the evaluation of the traffic generation of the proposed project, and the volume/capacity calculations which altered the real proposed project's traffic impacts. We estimate that a greater number of intersections may be significantly impacted by the subject development, as compared to those found by the LLG study. It is recommended that the subject LLG traffic study be revised to correct the inconsistencies found by our review.

Please call me if you have any questions with regard to our review.

Respectfully submitted,

COCO TRAFFIC PLANNERS, INC.



Dr. Antonio S. Coco, P.E.
President

ASC/mp
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SYNOPSIS OF

EXPERIENCE AND

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COCO TRAFFIC PLANNERS, INC.

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COCO TRAFFIC PLANNERS, INC.

Coco Traffic Planners is a civil engineering consulting firm specializing in transportation planning and design. The firm's expertise covers the fields of traffic operations and design, transportation engineering and planning, traffic control and signal design, striping plans, parking studies and design, planning circulation systems, and related engineering.

Founded in July 1992, Coco Traffic Planners provides both the public and the private sector with the best professional consulting services. The firm's staff has served in the traffic and transportation engineering fields for over thirty years, helping clients solve existing and potential traffic problems as they relate to the various projects' development phases.

Coco Traffic Planners has developed a unique proprietary computer program for the analysis of the traffic impacts associated with any type of development. The program constitutes a formidable environmental impact forecasting tool which enables the rapid solution of "what-if" type of conditions.

The program allows the evaluation of traffic impacts on a local level, as well as regional levels, by means of different methodologies currently accepted throughout Southern California (ICU, HCM, CMA methods). The program also can be tailored to include alternative methodologies to satisfy specific requirements and procedures. The traffic analyses can be performed in "real time" with regard to variables such as alternative land-use scenarios, project sizes, roadways' geometrics, and service volumes. This feature gives the company's clients the ability to evaluate their projects' traffic impacts under a variety of alternative scenarios. The optimal project thus can result from a cost-benefit analysis correlating the project to the traffic mitigation measures and other environmental concerns.

Over the years the staff's expertise has been applied to the analysis of the traffic impacts of virtually every type of land use as well as to the design of traffic signals, roadway striping, and parking plans. Coco Traffic Planners is included in the list of recommended traffic consultants for a number of cities in the Greater Los Angeles Area, and surrounding counties.

Coco Traffic Planners provides professional transportation and traffic engineering services in the following areas:

TRAFFIC OPERATIONS AND DESIGN

- Traffic signal design and modification
- Channelization, signing, and Roadway Design
- Computer Modeling for Traffic Engineering Applications
- Areawide Traffic Improvement Programs
- Central District Circulation and Traffic Studies
- Transportation Facilities Master Planning and Design

TRANSPORTATION PLANNING

- Site Traffic Circulation Studies
- Computer Modeling for Planning Applications
- Street and Highway Plans
- Special Area Traffic Planning
- Transportation Impact Studies
- Traffic Demand Management

PARKING

- Comprehensive Parking Needs and Studies
- Parking Facility Feasibility and Design
- Parking Management Programs

HIGHWAY AND TRAFFIC SAFETY

- High Accident Locations Identification and Solutions
- Traffic Control Device Inventories and Upgrading Studies

Following is a partial list of public, private, and professional organizations which Coco Traffic Planners has worked with:

Governmental Agencies

Cities of:
Los Angeles
LA Bureau of Street Lighting
LA Dept. of Airports
LA Dept. of Transportation
Agoura Hills
Anaheim
Baldwin Park
Bell Gardens
Beverly Hills
Burbank
Calabasas
Camarillo
Commerce
El Segundo
Garden Grove
Glendale
Hawthorne
Inglewood
Irvine
Lancaster
Long Beach
Malibu
Montebello
Monterey Park
Moorpark
Norco
Oxnard
Palmdale
Pasadena
Pico Rivera
Rancho Palos Verdes
Riverside
Rolling Hills Estates
Rowland Heights
San Bernardino
San Diego
San Fernando
Santa Ana
Santa Clarita
Santa Monica
Simi Valley
Thousand Oaks
Torrance
Victorville
West Covina
West Hollywood
Whittier

Counties of:
Los Angeles
Riverside
San Bernardino
Ventura

CALTRANS

Private Organizations

Ahmanson Development
Amir Development Company
ASR Development
Astro Burger, Inc.
Berlitz International
Beverly Carlton
BLT Enterprises, Inc.
Catalina Systems
Chambers Group, Inc.
Charles Co.
Dale Poe Development
Delson Company
Don Koll Company, Inc.
Douglas Emmett & Company
Dynamic Builders
Eclipse Development
Edco Development
Enterprise Devel. West, Inc.
FAB Enterprises
Forest City Development
Gale One Properties
General Growth Management
George C. Hopkins Construction
Goldrich and Kest, Inc.
Harlan Lee & Associates
HDR Engineering, Inc.
Herman Properties
IDM Development
Jack-In-The-Box Company
JAMA Construction Co.
JSM Construction
Kajima Associates
Keyes Motors, Inc.
Kol Company
Krismar Construction Co.
La Cagnina & Assoc., Inc.
Lazben Investment
Legacy Partners Residential, Inc.
Lion Tank Lines
Litton Industries
Maguire Thomas Partners
Maohr Hatorah Synagogue
Mastro Restaurant
McDonald's Corporation
MGP Building Corporation
Nessah Synagogue
Northern Refrigerated Transportation
Overton Moore Properties
Pace Development Co.
Parsons Brinckerhoff
Parsons De Leuw, Inc.
Phocis, Inc.
Prestige Homes , Inc.
Prada S.p.A.
Q & A Investment
Quizno's
Quor Inc.
Remax
Renaissance Arts Academy
Roman Catholic Archdiocese of LA
Sacks 5th Avenue
Sam's-U-Drive
Sam Sung Korean Presbyterian Church
Savvy Real Estate, Inc.
Schaffel Development Co.
SignComm, Inc.
Smart & Final Corporation
South Park Group
Starbuck's
Sun Lite Metals, Inc.
The Casden Company
The Coffee Bean & Tea Leaf
The Irvine Company
The Jonston Group
The Ketchum Company
Tucon Development
Voit Company
Watt Industries
Western Realco
World Port LA
Yves Saint Laurent of America

Other Professional Firms

Albert C. Martin & Assoc.
Arquitectonica
Bijan Dardashti Architect
Bijan & Associates
Blodgett/Baylosis Associates
Braemar Construction
Bridgers & Bridgers
Carey & Kutay Development Group
Cataldo Architects
CH2M Hill
Charles Luckman Assoc.
Chester Smith Associates
CMC Architects and Engineers
Dames & Moore
Daniel L. Dworsky & Assoc.
Danielian Associates
DC Architects
Dio Yang Designs
Diverse Design & Construction
DKS Associates
D.M.J.M. Co.
Ehrenkrantz Group & Eckstut
Ellerbe Becket
Enviacom
Envirotecture
Exclusive Designs
Gabbay Architects
Geosoils, Inc.
Harshad Patel Design Co.
Impact Sciences
I.P.D., Inc.
Jim Hinzdel & Associates
M2A Architects
McClintock, Becker & Assoc.
Meyer, Mohaddes Assoc.
Milan Lojdl Architect
Morley Builders
Morley Construction Co.
Murphy Architecture, Inc.
Myra L. Frank & Assoc.
Nicolas Patsaouras Assoc.
Nolan & Bannick, Inc.
Pace Engineering, Inc.
Pauline Amond & Assoc.
Pereira Associates
Perliter & Ingalsbe
Plus Architects
RHL Group, Inc.
Richard A. Stupin Associates
Richard Magee & Associates
Robbins & Brown, Inc.
Robert J. Bridges Architects
Takata Associates
Task Construction
Tau Design Group, Inc.
The Albert Group
The Lee Group
The Levander Company, Inc.
The Nadel Partnership
The Pearson Group
The Planning Company
The Ratkovich Company
The Roth Group, Inc.
The SW Group
The Voit Companies
Ultrasystems, Inc.
Urban Planning Consultants
Urban Strategies
VTN, Inc.
Welton Becket Assoc.
West Angeles Church Of God
Young-Schindler, Inc.

DR. ANTONIO S. COCO, P.E.

COCO TRAFFIC PLANNERS, INC.

CONSULTING TRANSPORTATION AND TRAFFIC ENGINEERS

10835 Santa Monica Boulevard, Suite 202, Los Angeles, California 90025-4695

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EMPLOYMENT HISTORY

July 1992 - present - President, Coco Traffic Planners, Inc.
April 1987 - June 1992 - Transportation Engineer (TE) Robert Crommelin & Assoc., Inc.
February 1985- March 1987 - TE, Linscott Law & Greenspan, Engineers
August 1984 - January 1985 - Assoc. Engineer (AE) Robert Crommelin & Assoc., Inc.
February 1981- February 1984 - AE, Di Paola & Tomasello Studio Geologico, Italy

AREAS OF PROFESSIONAL COMPETENCE

- Transportation Facilities Master Planning and Design
- Traffic Impact Studies and Reports for Environmental Evaluation
- Traffic Signal Design and Modification
- Street and Highway Channelization and Signing Design
- Traffic Control Plans
- Computer Modeling Traffic and Planning Engineering Applications
- Parking Feasibility, Access and Internal Circulation Design
- Transit Planning and Design
- Traffic and Parking Surveys and Reports
- Traffic Operations
- Traffic Demand Management

REPRESENTATIVE ASSIGNMENTS

- **LAX 2000 EIR**, Los Angeles. Provided traffic and parking impact analysis, traffic distribution forecast and assignment projections for proposed Los Angeles International Airport expansion from planned 40 million passengers per year (MAP) to 65 MAP by the year 2000.

- **Greater Crown Hill Specific Plan**, Los Angeles. Provided traffic projections access and circulation analysis, intermodal transportation analysis, traffic signal installation evaluation, and traffic and parking impact studies, for proposed 8.4 million square feet (MSF) of mixed-use development which included 5.4 MSF of office space, 430 hotel rooms, 1,274 apartment units and 0.65 MSF of retail space.

- **Warner Center**, San Fernando Valley. Provided traffic impact studies, access and circulation studies, and traffic signal installation evaluation for over four million square feet of mixed-use development.

- **Traffic Signal Design.** Principal In-Charge of the Bellflower-Compton Project, administered by the County of Los Angeles (COLA). Designed 4 signalized intersections along Compton Boulevard in the City of Bellflower.

- **Pike Mixed-Use Development Project**, Long Beach. Provided transportation and traffic impact studies, parking access and circulation for proposed 3.4 million square feet (MSF) of mixed-use development which included 1.7 MSF of office space, 500 hotel rooms, 1,000 apartment units and 0.3 MSF of retail space.

- **LADOA Hotel-Office**, Los Angeles International Airport. Provided traffic impact studies, access and circulation studies for proposed 0.75 MSF of hotel-office space.

Traffic, access, and circulation studies in the Cities of:

- **Beverly Hills** - Berlitz International School; Beverly Hills Mercedes; Saks 5th Avenue; Doheny/Wilshire; 9150 Wilshire; 8600 Wilshire; Robertson/Wilshire
- **Calabasas** - Corporate Center Office Complex; Park Centre
- **El Segundo** - Continental City
- **Glendale** - Gateway Center; 1141 N Brand Blvd
- **Garden Grove** - Westbrook Shopping Center
- **Huntington Park** - Gage Jr. High School
- **Long Beach** - Wrather Corporation/Queen Mary
- **Los Angeles** - Century Plaza Tower Hotel; USC-NME Medical Center; 6th/Main Parking Building; Pacific Lighting Co.; 7th/Figueroa Home Savings Project; 8th/Figueroa California First Bank Project; Beaudry Center; Convention Center; Wilshire Plaza; Westwood Gateway; The Beverly Center; Gene Autry Museum; Warner Place/Topanga Plaza; West Angeles Church of God
- **Malibu** - J. Paul Getty Museum
- **San Bernardino** - Krikorian Premiere Theatre
- **Sherman Oaks** - Sherman Oaks Fashion Square
- **West Covina** - West Covina Senior Commons

PROFESSIONAL MEMBERSHIPS

Institute of Transportation Engineers (ITE) - Member.
American Society of Civil Engineers (ASCE) - Member.
Consulting Engineers and Land Surveyors of California (CELSOC) - Member.
American Consulting Engineers Council (ACEC) - Member.

LICENSES

Registered Professional Engineer State of Arizona - Civil #26839
Registered Civil Engineer, Italy

ACADEMIC BACKGROUND, DEGREES

1984 - Doctor of Civil Engineering Specializing in Transportation Engineering, Universita' di Roma "La Sapienza", Rome, Italy.

MARCO PIANA

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EMPLOYMENT HISTORY

June 2006 - Present - Associate Engineer, Coco Traffic Planners, Inc.
May 2004 - Present - Cofounder, Studio Ghigos, Lissone, Italy (IT)
June - September 2005 - Consulting Engineeer, Geologia Spano', Macugnaga, IT
January 2004 - May 2005 - Project Manager, Assocave, Domodossola, IT
April - December 2003 - Project Manager, S.T.G., Milan, IT
April - July 2003 - Consulting Engineer, Loris Cecchini, Milan, IT
July - December 2002 - Assistant Engineer, Atelier Villard/Denis Tricot, Lyon, France
January 1994 - April 2003 - Blasting and Pyrotechnics Engineer, Domodossola, IT

HONOURS AND AWARDS

Jul. 02 – Dec. 02	Leonardo Fellowship by European Union for an internship in Lyon, France
Jan. 02 – Jun. 02	Erasmus C.R.I (Center for International Relations) fellowship
1996 / 99 / 00	ISU fellowship
Sep. 96 – Apr. 98	Cariplo Foundation Fellowship

AREAS OF PROFESSIONAL COMPETENCE

- Project Management, Operations, Purchasing, Budgeting, and Coordination
- Street and Highway Channelization and Signing Design
- Traffic Signal Design and Modification
- Commercial and Residential Projects Architectural and Engineering Design
- Computer Modeling for Traffic and Planning Engineering Applications
- Transportation Facilities Master Planning and Design
- Traffic Impact Studies and Reports for Environmental Evaluation
- Parking Demand Access and Internal Circulation Design
- Green Buildings Thermal Dimensioning, and Control Systems Design

REPRESENTATIVE ASSIGNMENTS

- **Studio Ghigos, Lissone (IT),** Cofounder, Technical Consultant, and Project Manager: Founded in May 2004 as the business evolution of Gruppo Ghigos, an architecture and design studio focused on the planning, design, and development of sustainable architecture. Built profitable, mutually beneficial relationships with numerous developers and municipalities, repeatedly securing competitive new contracts. Negotiation expertise significantly improved client's buying power, while lowering operating costs.

- **Val d'Ossola Hydroelectric Energy Farm.** Conducted feasibility study for a low capacity hydroelectric energy farm.

- **Stone Show Room Design, Crevoladossola (IT).** Winner of a public competition organized by the City of Crevoladossola, prepared sustainable architectural and engineering plans for a permanent stone show room.

- **Project Manager for:** ASSOCAVE (Domodossola, IT), the association of the natural mining and processing companies for the 3rd largest Italian stone district, was the only company representative to local public administrations and national associations; European Community funded program to plan the company expansion in the US and Eastern European markets. Brioschi Group Stand for the Real Estate Expo. Mixed-Use Development in Podenzano (Italy). Società Tecnica Generale (STG) Engineering Company - Designed and produced construction plans for commercial and residential developments; Maintained corporate internal and external reporting; Performed thermal dimensioning of green buildings, with an emphasis on low energetic dispersion; Designed thermo technical control systems; Evaluated quality and sustainability of built environments; Prepared environmental improvement plan for waist dumps; Identified opportunities for strategic alliances and partnerships to promote business goals; Was responsible for day-to-day operations, including staff supervision, purchasing, budgeting, financing, and consultant supervision and coordination.

- **Technical Consultant for:** LORIS CECCHINI (Milan, Italy), notable Italian artist, in the Darc3 competition for the development of executive plans for macro-sculpture works. ATELIER VILLARD (Lyon, France) Architecture study with focus on planning, recovery and interior design, served as main architect in all phases of the plan, and as construction site director. DENIS TRICOT (Lyon, France), notable French artist, for the realization of spaces in sculpture.

- **Acrobatic Works, Blasting and Pyrotechnics Engineer:** Technical Assistant for planning, design, and evaluation of new technologies for the stabilization of quarries. Veneranda Fabbrica del Duomo di Milano, planned rockfall stoppers, deflection barriers, and hazard management for the Milan Dome marble quarry. As blaster and rock-climber assistant was involved in securing rock walls resulting from landslides; perforations and acrobatic works in rock walls.

LICENSES

Registered Civil Engineer, Italy - Civil #C047437

ACADEMIC BACKGROUND, DEGREES

2003 - Ordine degli Ingegneri di Milano, Milano, Italy. European/Italian Professional Engineer Registration

2003 - M.S. Civil Engineering Specializing in Building Technology
Politecnico di Milano B.E.S.T., Milan, Italy

2002 - Faculté Polytechnique de Mons, Mons, Belgium
Erasmus International Study Program

LANGUAGES

English (proficient); French (proficient); Spanish (communicative), Italian (native).

TAHER JALAI, P.E.

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EMPLOYMENT HISTORY

Coco Traffic Planners, Inc. - Senior Engineer
City of Anaheim - (present) Associate Traffic Engineer
City of Costa Mesa - Assistant Civil Engineer
DKS Associates - Transportation Engineer
City and County San Francisco - Student Intern

PUBLICATIONS

TRANSYT Signal Timing Pattern Evaluation - Safety Project No. 8011 (S001). Professor P.T. McCoy, T. Jalai, A.K. Mohaddes.

AREAS OF PROFESSIONAL COMPETENCE

- Traffic Signal Design and Modification
- Street and Highway Channelization and Signing Design
- Transportation Facilities Master Planning and Design
- Traffic Impact Studies and Reports for Environmental Evaluation
- Parking Demand Access and Internal Circulation Design.
- Computer Modeling Traffic and Planning Engineering Applications
- Traffic Operations

REPRESENTATIVE ASSIGNMENTS

- **Traffic Signal Design**. Task Manager of the Long Beach-Los Angeles Rail Transit Project (BLUE LINE), designed 12 signalized intersections along Alameda Street and Rosecrans Avenue in the City of Compton. Project Manager for traffic signal design projects for the cities of Glendale, Torrance, Los Angeles, Irwindale, City of Industry, and Alhambra.

- **Signal System Design**. Performed coding, calibration and optimization for traffic signal systems in the Cities of San Francisco, Manhattan Beach, Bakersfield, Torrance and Costa Mesa, as part of California's FETSIM program. Coded, calibrated and conducted "before" and "after" studies on five traffic signal systems with a total of 215 traffic signals in the City of Lincoln, Nebraska. In addition, assisted in the development of traffic responsive plan introduction thresholds for computerized traffic signal systems.

  Designed phasing and signal timing for isolated traffic signals in San Francisco. Analyzed signalized intersections in conjunction with the BLUE LINE operations, using SATSPREAD. Performed bench testing for the new and modified traffic surveillance and control software.

- **Geometric Design.** Analyzed on/off ramp geometric and alignment requirements for the I-5 widening project in the City of Anaheim. The analysis resulted in the modification of Caltrans' designs with estimated savings of about $12 million. Task manager for the MC-5 alternative of the BLUE LINE. Responsible for development of 35 signing and striping plans and 26 street lighting contract drawings.

  Prepared over 50 roadway signing and striping plans for the Mid-Corridor and Long Beach segments of the BLUE LINE. Designed detour plans for vehicular traffic and pedestrian movements at major crossings in the cities of Anaheim, Los Angeles, Compton, and Long Beach. Identified and designed driveway access locations and alignments for the Alameda Street improvement project. The project had an approximate aggregate length of 5.3 miles.

- **Light Rail Transit Operations**. Analyzed impact of light rail transit on traffic operation at intersections and mid-block crossings along the BLUE LINE. Developed both light rail and traffic signal operation strategies. Analyzed the impacts of preferred alternative on traffic, transit, parking and railroad operations for the draft EIR. Also, evaluated traffic and operational impacts of LRT for the San Fernando Valley Route Refinement Study.

- **Transportation Planning**. Project Manager for the Transportation Element of the General Plan update for the cities of Anaheim and Costa Mesa. Responsible for identification of transportation projects in the City of Anaheim for the Orange County combined Transportation Funding Programs. Responsible for management, analysis and coordination of efforts between the City of Anaheim and the County of Orange for the City's 1992 Congestion Management Program compliance efforts. Responsible for modeling and calibration of Costa Mesa Traffic Model (CMTM).

  Prepared applications of State-Local Transportation Demonstration Program Funds (SB-140) and OCTA's Regional Bikeway Program (SB- 821). Reviewed numerous Environmental Impact Reports for major regional developments in Orange County.

PROFESSIONAL MEMBERSHIPS

Institute of Transportation Engineers (ITE) - Member.

LICENSES

Registered Professional Engineer State of California - Civil #C047437

ACADEMIC BACKGROUND, DEGREES

1984 - Ph.D. Candidate, Civil Engineering - University of Nebraska
1983 - M.S. Civil Engineering - University of Nebraska
1981 - B.S. Civil Engineering - University of Nebraska