
ADDENDUM TO THE EIR

Section 15160 of the CEQA Guidelines explains that there are several mechanisms, and variations in environmental documents, that can be tailored to different situations and intended uses of environmental review. Specifically, Section 15160 states that the “. . . variations listed [including Subsequent EIRs, Supplemental EIRs, and Addendums] are not exclusive. Lead agencies may use other variations consistent with the Guidelines to meet the needs of other circumstances.” This provision allows Lead agencies to tailor the use of CEQA mechanisms (such as this Addendum) to fit the circumstances presented to the Lead agency by a project. Here, the City has opted to prepare an Addendum to assess the minor modifications of the Project that have transpired since preparation of the EIR.

Specifically, Section 15164 of the CEQA Guidelines states:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

Section 15162 of the CEQA Guidelines provides the criteria for preparing a Subsequent EIR or Negative Declaration. Specifically, a Subsequent EIR or new Negative Declaration is required when there are substantial changes to a project that involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects; substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previously approved EIR; or new information of substantial importance, which was not known and could not have been known with reasonable diligence at the time the previous EIR was certified, show more or more severe significant effects, new feasible mitigation measures or alternatives are available but not adopted.

As required in subsection (e), above, substantial evidence supporting the Lead agency's decision not to prepare a Subsequent EIR or new Negative Declaration pursuant to CEQA Guidelines Section 15162 is provided below, under the “Environmental Impact Analysis” subheading. The environmental analysis

evaluates the potential impacts of the proposal modifications in relation to the current environmental conditions and in consideration of the environmental findings for the Project.

As summarized below, the changes proposed are relatively minor and would not result in any new significant environmental impacts. The analysis contained herein demonstrates that all of the impact issues previously examined in the approved EIR would remain unchanged with the proposed modifications.

Therefore, as described in further detail below, the analysis of the Project modifications supports the determination that the proposed changes would not involve new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects which would call for, as provided in Section 15162 of the State CEQA Guidelines, the preparation of a Subsequent EIR or Negative Declaration. Therefore, the City has elected to prepare this variation of an Addendum to the approved EIR as the appropriate form of documentation to meet the statutory requirements of CEQA.

PROJECT MODIFICATIONS

The Martin Expo Town Center Final EIR was certified on March 24, 2016. Subsequent to EIR certification, the following minor Project modifications were proposed:

- Remove the existing southbound right-turn raised island on the northwest corner of the intersection of Bundy Drive and Olympic Boulevard.
- Add a median island on Bundy Drive north of Olympic Boulevard to physically restrict illegal left-turn movements to/from Mississippi Avenue.
- Reduce the creative office space from 200,000 square feet to 150,000 square feet. The reduction in office square footage would be transferred to the residential component of the Project, although the total number of residential units would remain at 516.
- Reduce the supermarket from 50,000 square feet to 35,000 square feet. The 15,000-square-foot supermarket reduction would be transferred to general retail and quality restaurant uses, increasing those two components of the Project from 40,000 square feet to 46,000 square feet, and 5,000 square feet to 14,000 square feet, respectively. Of the remaining 35,000 square feet for the supermarket, only 29,000 square feet may be dedicated to grocery sales, with the remainder dedicated to ancillary uses.
- Provide up to 100 parking spaces for transit patrons of the Metro Exposition Light Rail Bundy Station.

ENVIRONMENTAL IMPACT ANALYSIS

Aesthetics

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same maximum height (160 feet). In addition, the Project design is not materially changing and the Project would continue to include the same uses (residential, retail, restaurant, and office), although the

office component would be slightly smaller and the residential units on average would be slightly larger. The character of the development would remain the same and there would be no change in the Project's general street configurations or relationship to the surrounding community. Thus, no new impacts related to aesthetic character, views, shadows, light, and glare would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to aesthetics.

Air Quality

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) as previously analyzed. Therefore, with regard to construction emissions, the equipment mix and their respective operating hours for each of the various phases of construction (demolition, Site preparation, grading and earthwork, building construction, asphalt paving, and architectural coatings) would remain the same as contemplated in the certified EIR. As such, the peak day regional and local construction emissions for each of the required construction activities would remain unchanged from what was analyzed in the certified EIR. Thus, no new impacts related to construction emissions would result from implementation of the Project with the proposed modifications.

As discussed in more detail under "Traffic" below, with the proposed modifications, the Project would result in 132 fewer daily trips, 17 fewer AM peak hour trips, and the same number of evening peak hour trips when compared to the Project analyzed in the certified EIR. Therefore, the analysis provided in the certified EIR contemplates the greatest amount of mobile source emissions, and no new impacts related to either regional or localized operational emissions would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to air quality.

Geology and Soils

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same maximum height (160 feet). The proposed modifications would not change the geologic conditions at the Project Site because the modifications are small changes in square footages between different uses, and the Project retains the same overall mix of land uses and overall development size. Thus, no new impacts related to geology and soils would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to geology and soils.

Greenhouse Gas Emissions

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) as previously analyzed. Therefore, during construction, the equipment mix and their respective operating hours for each of the various phases of construction would remain the same as contemplated in the certified EIR. As such, the GHG emissions during construction of the Project with the proposed modifications would remain unchanged from what was analyzed in the certified EIR. Thus, no new impacts related to GHG emissions during construction would result from implementation of the Project with the proposed modifications.

As discussed in more detail under “Traffic” below, with the proposed modifications, the Project would result in 132 fewer daily trips, 17 fewer AM peak hour trips, and the same number of evening peak hour trips when compared to the Project analyzed in the certified EIR. Therefore, the analysis provided in the certified EIR contemplates the greatest amount of GHG emissions from mobile sources. In addition, as the overall size of the Project remains the same, and as 50,000 square feet will be transferred from office to residential uses (which are likely to generate fewer GHG emissions than the office uses), the analysis provided in the certified EIR contemplates the greatest amount of GHG emissions from area, energy, waste, and water sources. As such, no new impacts related to operational GHG emissions would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to greenhouse gas emissions.

Hazards and Hazardous Materials

With the Project modifications discussed above, the Project remains the same size (807,200 square feet). The potential for hazardous materials impacts to occur would not change based on the proposed Project modifications as the same uses are proposed, in the same overall size and scale (with small changes in square footages between different uses). No new land uses are proposed that could create different hazardous materials impacts. Thus, no new impacts related to hazards and hazardous materials would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hazards and hazardous materials.

Hydrology and Water Quality

With the Project modifications discussed above, the Project remains the same size (807,200 square feet). The proposed modifications would not change the hydrologic and drainage conditions at the Project Site because the modifications are small changes in square footages between different uses, and the Project retains the same overall mix of land uses and overall development size. Thus, no new impacts related to hydrology would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to hydrology and water quality.

Land Use and Planning

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same maximum height (160 feet). The Project would continue to include the same mix of uses (residential, office, retail, and restaurant), and therefore the same discretionary actions would be required. The character of the development would remain the same and there would be no change in the Project's street configurations or relationship to the surrounding community. In addition, the Project would continue to meet policy objectives related to transit-oriented development, walkability and pedestrian activation and connectivity to the same extent previously analyzed. Thus, no new impacts related to land use and planning would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to land use and planning.

Noise

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) as previously analyzed. Therefore, with regard to construction noise, the equipment mix and their respective operating hours for each of the various phases of construction (demolition, Site preparation, grading and earthwork, building construction, asphalt paving, and architectural coatings) would remain the same as contemplated in the certified EIR as the overall development enveloped would remain the same. As such, the noise from construction of the Project with the proposed modifications would remain unchanged from the previous analysis contained in the certified EIR.

As discussed in more detail under "Traffic" below, with the proposed modifications, the Project would result in 132 fewer daily trips, 17 fewer AM peak hour trips, and the same number of evening peak hour trips when compared to the Project analyzed in the certified EIR. Therefore, the analysis provided in the certified EIR contemplates the greatest amount of mobile source noise increases due to Project-generated traffic. In addition, as the overall size of the Project remains the same, and as the Project would continue to provide the same mix of uses (with small changes in square footage between the different uses), the operational noise of the Project with the proposed modifications would remain the same. Thus, no new impacts related to operational noise would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to noise.

Population and Housing

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516) with the same bedroom counts as analyzed in the certified EIR. Thus, the expected population and housing units on-site would not change from what was contemplated in the certified EIR. The changes in square footage would affect the estimated employee generation. As shown in Table 1 below, with the proposed modifications the Project would generate approximately 1,006 employees net after the removal of the existing uses, which is a reduction of approximately 137 employees when compared to the certified EIR. Thus, no new impacts related to

population, housing, and employment would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to population and housing.

**Table 1
Revised Employee Generation**

| Land Use | Size | Generation Rates | Total |
|--|------------|---|-------------------------------------|
| Proposed Uses | | | |
| Grocery Store | 35,000 sf | 1 employee / 424 square feet ¹ | 83 |
| General Retail | 46,000 sf | 1 employee / 369 square feet ² | 125 |
| Restaurant ⁶ | 18,000 sf | 1 employee / 75 square feet ³ | 240 |
| Creative Office | 150,000 sf | 1 employee / 209 square feet ⁴ | 718 |
| Subtotal Proposed | | | 1,166 |
| Existing Uses (Removed) | | | (160 employees) ⁵ |
| Total Net (Proposed – Existing) | | | 1,006 |

Note: sf = square feet

¹Grocery Store: Neighborhood-specialty grocery store from Il Villaggio Toscano EIR (2010), page IV.I-11: <http://cityplanning.lacity.org/eir/VillaggioToscano/DEIR/files/IV.I%20%20Population,%20Housing,%20and%20Employment.pdf>. Reference to Retail uses for Los Angeles County as provided in SCAG's Employment Density Summary Report (October 2001).

²General Retail: Neighborhood Shopping Centers, from LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11.

³Restaurant: Food and Beverage, from Millennium Hollywood EIR (2012), Appendix IV.I Population and Employment Projections (6-8-12), RCLCO: <http://cityplanning.lacity.org/eir/Millennium%20Hollywood%20Project/DEIR/DEIR%20Millennium%20Hollywood%20Project.html>

⁴Creative Office: Standard Commercial Office, from LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11. Although the Project is proposing creative office, this estimate uses the Standard Commercial Office rate, which is the largest office rate listed and provides the most conservative estimate.

⁵Source for existing employees: Dan Martin, Martin Cadillac, August 29, 2012.

⁶Includes both "Quality Restaurant" and "High-Turnover Sit Down Restaurant" categories.

Table: CAJA Environmental Services, August 2016.

Public Services

Fire Protection

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same mix of uses (residential, retail, restaurant, and office) and with small changes in square footages between different uses. The estimated residential population and number of housing units would remain unchanged, and the number of on-site employees would be slightly reduced when compared to the certified EIR. Thus, the proposed modifications would not change the availability of services (fire stations) and their access routes to the Site and no new impacts related to fire protection would occur from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to fire protection.

Police Protection

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same mix of uses (residential, retail, restaurant, and office) and with small changes in square footages between different uses. The estimated residential population and number of housing units would remain unchanged, and the number of on-site employees would be slightly reduced when compared to the certified EIR. Thus, the proposed modifications would not change the availability of services (police units) and their access routes to the Site and no new impacts related to police protection would occur from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to police protection.

Schools

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same mix of uses (residential, retail, restaurant, and office) and with small changes in square footages between different uses. The estimated residential population and number of housing units would remain unchanged. As discussed above, with the proposed modifications, the Project would generate approximately 1,006 employees, which is 137 fewer employees than what was contemplated in the certified EIR. Student generation is calculated by a mix of direct residential units (which is unchanged) and indirect employee generation (which is decreased). Therefore, with the proposed modifications, the Project would generate 37 fewer students than contemplated in the certified EIR (see Table 2, below). Thus, no new impacts related to schools would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to schools.

Table 2
Revised Student Generation (Net Change)

| Land Use (reduction) | Employee Generation | Student Generation | | | |
|--|------------------------|--------------------|--------|------|-------|
| | | Elementary | Middle | High | Total |
| Commercial Uses | (137) | (21) | (5) | (11) | (37) |
| <i>137 employees generate 37 students, using 0.2691 students per employee rate from 2012 Developer Fee Justification Study. Commercial/office rates are for total number of students, not broken down by elementary, middle, or high school. Thus, the total will be broken down by the same relative rate as households: 4:1:2.</i> | | | | | |
| <i>Source: CAJA Environmental Services, August 2016.</i> | | | | | |

Parks

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same mix of uses (residential, retail, restaurant, and office) and with small changes in square footages between different uses. Residential uses have the direct impact on parks, and as the estimated residential population and number of housing units would remain unchanged, Project impacts with respect to parks would remain unchanged. Thus, no new impacts related to parks would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to parks.

Libraries

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same mix of uses (residential, retail, restaurant, and office) and with small changes in square footages between different uses. Residential uses have the direct impact on libraries, and as the estimated residential population and number of housing units would remain unchanged, Project impacts with respect to libraries would remain unchanged. Thus, no new impacts related to libraries would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to libraries.

Traffic

A technical memorandum dated July 13, 2016, was prepared by the traffic consultant (Fehr & Peers) to analyze the traffic impacts of the proposed modifications (which is attached to this Addendum).

Removal of Existing Southbound Right-Turn Island at Bundy Drive and Olympic Boulevard

As a Project mitigation measure, as discussed in the certified EIR, the Project is required to restripe the northbound and southbound approaches of Bundy Drive at Olympic Boulevard to provide dual left-turn lanes on both approaches. These proposed improvements will mitigate Project-related traffic impacts at this location to less than significant. This mitigation also involved the removal of the existing southbound exclusive right-turn lane resulting in a southbound approach configuration of two left turn lanes, one through lane, and one shared through/right turn lane.

The proposed new changes to this intersection, over and above the currently proposed mitigation described in the certified EIR, would involve the removal of the existing southbound right-turn triangular median island (“pork-chop”) on the northwest corner of the intersection. The island currently facilitates the southbound right turns from Bundy Drive on to westbound Olympic Boulevard. The improvement would remove the triangular island and extend the curb such that the pedestrian crossing distance along the west leg of Olympic Boulevard at this intersection would be reduced, promoting pedestrian walkability and safety. This improvement is subject to review and approval by LADOT.

The removal of the southbound right-turn triangular island and the potential addition of a median island on Bundy Drive at Mississippi Avenue (described below) would not require a change in the number of lanes available for vehicles or bikes beyond the lane changes already made as part of the Project mitigation measure. The improvement would similarly not require any changes in signal phasing so no reduction in vehicular capacity along Bundy Drive or Olympic Boulevard is expected. A conceptual drawing of the proposed improvement is included as Figure 1 of the attached traffic technical memorandum.

Addition of Median Island on Bundy Drive at Mississippi Avenue

As part of the overall improvements at this intersection, a raised median island could potentially be constructed on Bundy Drive north of Olympic Boulevard, separating the southbound approach and northbound departure lanes to physically restrict illegal left turns which occasionally occur from southbound Bundy Drive onto eastbound Mississippi Avenue and from westbound Mississippi Avenue onto southbound Bundy Drive. This improvement is subject to review and approval by LADOT. This improvement, which is also shown on Figure 1 of the attached traffic technical memorandum, would not affect the Project traffic impact analysis.

Parking Spaces for Expo Light Rail Transit (LRT) Riders

The Project would offer up to 100 parking spaces for use by Expo LRT riders. Alternative 5 contained in the certified EIR analyzed providing 50 parking spaces for use by Expo LRT riders. Trips to/from the Project Site associated with these 100 parking spaces would normally not be considered new trips generated by the Project since these trips are generated by the Expo LRT, and these vehicles are assumed to be otherwise parking at other nearby on-street or off-street parking spaces. However, to be conservative, the 100 Expo LRT parking spaces were assumed to generate net new trips attributable to the Project. For daily trip generation estimates, it was assumed that each space would turnover at the rate of 1.5 times in a 24-hour period. This would result in a total of 300 daily trips (150 inbound and 150 outbound). During the morning and evening peak hours, it was assumed that out of the 100 spaces, 50 spaces would generate some vehicular activity (either inbound or outbound). The inbound and outbound directional distribution were assumed to be similar to an office land use, as these spaces are likely to be used by commuters arriving in the morning peak hour and departing in the evening peak hour.

Trip Generation

As shown in Table 1 of the attached traffic technical memorandum, with the proposed modifications (including the changes in square footages and the 100 parking spaces for the Expo LRT riders), the Project would result in a revised trip generation of 7,019 net new daily trips, of which 409 trips (218 inbound/191 outbound) would be generated in the morning peak hour and 624 trips (320 inbound/304 outbound) would be generated in the evening peak hour. When compared to the trip generation estimates contained in the certified EIR, the proposed modifications would result in 132 fewer net daily trips, 17 fewer morning peak hour trips, and no change in the evening peak hour trips.

Intersection Impact Analysis

The Project as evaluated in the certified EIR was estimated to result in significant traffic impacts at seven intersections before mitigation and five intersections after mitigation under the Existing plus Project scenario, at 14 intersections before mitigation and 12 intersections after mitigation under the Future (Year 2018) plus Project scenario, and at 15 intersections before mitigation and 13 intersections after mitigation under the Horizon (Year 2030) plus Project scenario.

As part of the traffic technical memorandum, a detailed level of service impact analysis was conducted under both existing and cumulative conditions with the proposed modifications. As shown in Tables 2, 3, and 4 of the attached traffic memorandum, the changes proposed to the Project would not result in any new significantly impacted intersections under the Existing plus Project and Future (Year 2018) plus Project scenarios. However, under the Horizon (Year 2030) plus Project scenario, the proposed modifications would result in one fewer significantly impacted intersection when compared to the previous analysis in the certified EIR.

Neighborhood Street Segment Impact Analysis

The neighborhood street segment impact analysis was also revised to reflect changes in daily traffic volumes on the analyzed neighborhood street segments resulting from the proposed modifications. Tables 5, 6, and 7 of the attached traffic technical memorandum show the analysis for Existing, Future (Year 2018), and Horizon (Year 2030) scenarios, respectively. As shown, the proposed changes to the Project would not result in any significant impacts at the study neighborhood street segments. This is the same conclusion as reached previously in the certified EIR.

Traffic Conclusion

As demonstrated above and in the attached traffic technical memorandum, no new impacts related to traffic would result from implementation of the Project with the proposed modifications. Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to traffic.

Utilities and Service Systems

Wastewater

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516). Thus, there would be no change in the amount of residential wastewater generated at the Project Site beyond what was contemplated in the certified EIR. The changes in square footage would affect the commercial wastewater generation. As shown in Table 3 below, with the proposed modifications, the Project would generate approximately 86,690 gallons per day (gpd) (net after the removal of the existing auto dealership uses), which is a reduction of approximately 4,350 gpd when compared to the analysis contained in the certified EIR. Thus, no new impacts related to wastewater would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to wastewater.

**Table 3
Revised Wastewater Generation**

| Land Use | Size | Wastewater Generation Rates | Total (gpd) |
|--|-------------|------------------------------------|--------------------|
| Existing | | | |
| Auto Dealership (to be removed) | 99,399 sf | 50 gallons / 1,000 sf | (4,970) |
| Existing Subtotal (to be removed) | | | (4,970) |
| Proposed | | | |
| Residential – Studio | 78 DU | 75 gallons / unit | 5,850 |
| Residential – 1-Bedroom | 206 DU | 110 gallons / unit | 22,660 |
| Residential – 2-Bedroom | 207 DU | 150 gallons / unit | 31,050 |
| Residential – 3-Bedroom | 25 DU | 190 gallons / unit | 4,750 |
| Grocery Store | 35,000 sf | 80 gallons / 1,000 sf | 2,800 |
| Retail | 46,000 sf | 25 gallons / 1,000 sf | 1,150 |
| Restaurant | 18,000 sf | 300 gallons/ 1,000 sf | 5,400 |
| Creative Office | 150,000 sf | 120 gallons / 1,000 sf | 18,000 |
| Proposed Subtotal | | | 91,660 |
| Total (Proposed – Existing) | | | 86,690 |
| <p><i>Note: sf = square feet; DU = dwelling unit, gpd = gallons per day</i> <i>Source: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, January 8, 2013.</i> <i>The Correspondence did not break down the total retail into retail, restaurant, and grocery store. Therefore, the following rates apply to grocery store and restaurant:</i> <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i> <i>Restaurant: representative based on a rate per square footage is for Restaurant: Take Out 300 gallons/1,000 sf</i> <i>Grocery Store: representative rate is for Retail Area: 80 gallons/1,000 sf.</i> <i>Table: CAJA Environmental Services, August 2016.</i></p> | | | |

Water

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516). Thus, there would be no change in the amount of residential water consumed at the Project Site beyond what was contemplated in the certified EIR. The changes in square footage would affect the commercial water consumption. As shown in Table 4 below, with the proposed modifications, the Project would consume approximately 104,568 gpd (net after the removal of the existing auto dealership uses), which is a reduction of approximately 5,568 gpd when compared to the analysis contained in the certified EIR. Thus, no new impacts related to water would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to water.

**Table 4
Revised Water Demand**

| Land Use | Size | Water Demand Rates | Total (gpd) |
|---|-------------|---------------------------|--------------------|
| Existing | | | |
| Auto Dealership (to be removed) | 99,399 sf | 64 gallons / 1,000 sf | (6,362) |
| Existing Subtotal (to be removed) | | | (6,362) |
| Proposed | | | |
| Residential – Studio | 78 DU | 88.5 gallons / unit | 6,903 |
| Residential – 1-Bedroom | 206 DU | 130 gallons / unit | 26,780 |
| Residential – 2-Bedroom | 207 DU | 177 gallons / unit | 36,639 |
| Residential – 3-Bedroom | 25 DU | 224 gallons / unit | 5,600 |
| Grocery Store | 35,000 sf | 102.4 gallons / 1,000 sf | 3,584 |
| Retail | 46,000 sf | 32 gallons / 1,000 sf | 1,472 |
| Restaurant | 18,000 sf | 384 gallons/ 1,000 sf | 6,912 |
| Creative Office | 150,000 sf | 153.6 gallons / 1,000 sf | 23,040 |
| Proposed Subtotal | | | 110,930 |
| Total (Proposed – Existing) | | | 104,568 |
| <p><i>Note: sf = square feet; DU = dwelling unit, gpd = gallons per day</i> <i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i> <i>Rates: Correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, January 8, 2013.</i> <i>The Correspondence did not break down the total retail into retail, restaurant, and grocery store. Therefore, the following rates apply to grocery store and restaurant:</i> <i>City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors.</i> <i>Restaurant: representative based on a rate per square footage is for Restaurant: Take Out 300 gallons/1,000 sf</i> <i>Grocery Store: representative rate is for Retail Area: 80 gallons/1,000 sf.</i> <i>Table: CAJA Environmental Services, August 2016.</i></p> | | | |

Solid Waste

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516). Thus, there would be no change in the amount of residential solid waste generated at the Project Site beyond what was contemplated in the certified EIR. The changes in square footage would affect the commercial solid waste generation. As shown in Table 5 below, with the proposed modifications, the Project would generate approximately 7,728 pounds per day (ppd) (net after the removal of the existing auto dealership uses), which is a reduction of approximately 693 ppd when compared to the analysis contained in the certified EIR. Thus, no new impacts related to solid waste would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to solid waste.

**Table 5
Revised Solid Waste Generation**

| Land Use | Size | Solid Waste Generation Rates | Total (pounds) |
|--|------------|------------------------------|----------------|
| Existing | | | |
| Auto Dealership (to be removed) | 99,399 sf | 0.9 pounds / 100 sf | (895) |
| Existing Subtotal (to be removed) | | | (895) |
| Proposed | | | |
| Residential | 516 DU | 12.23 pounds / unit | 6,311 |
| Grocery Store | 35,000 sf | 3.12 pounds /100 sf | 1,092 |
| Retail | 46,000 sf | 5 pounds / 1,000 sf | 230 |
| Restaurant | 18,000 sf | 5 pounds / 1,000 sf | 90 |
| Creative Office | 150,000 sf | 6 pounds / 1,000 sf | 900 |
| Proposed Subtotal | | | 8,623 |
| Total (Proposed – Existing) | | | 7,728 |
| <p><i>Note: sf = square feet; DU = dwelling unit</i> <i>Rates: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/</i> <i>Auto Dealership: using Auto dealer and service station rate of 0.9 pounds/100 sf; source: Guide to Solid Waste and Recycling Plans for Development Projects (Santa Barbara County Public Works Department). Cites SWANA Tech. Bull. 85-6; Recovery Sciences, 1987; and Matrix Mgmt Group, "Best Management Practices Analysis for Solid Waste".</i> <i>Residential – 12.23 pounds/unit; source: City of Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (DRAFT).</i> <i>Grocery Store: using Supermarket rate of 3.12 pounds/100 sf; source: Guide to Solid Waste and Recycling Plans for Development Projects (Santa Barbara County Public Works Department). Cites SWANA Tech. Bull. 85-6; Recovery Sciences, 1987; and Matrix Mgmt Group, "Best Management Practices Analysis for Solid Waste".</i> <i>Retail – 5 pounds/1,000 sf; source: City of LA Dept. of City Planning doc "EIR Manual for Private Projects".</i> <i>Restaurant: using Restaurant rate of 5 pounds per 100 sf; source: Draft EIR for North Hills Development (Santa Clarita). EIR cites City of LA Bureau of Solid Waste, 1989, as source.</i> <i>Creative Office: using Office rate of 6 pounds per 1,000 sf; source: Draft EIR for North Hills Development (Santa Clarita). EIR cites City of LA Bureau of Solid Waste, 1989, as source.</i> <i>Table: CAJA Environmental Services, August 2016.</i></p> | | | |

Energy

Electricity

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516). Thus, there would be no change in the amount of residential electricity consumed at the Project Site beyond what was contemplated in the certified EIR. The changes in square footage would affect the commercial electricity consumption. As shown in Table 6 below, with the proposed modifications, the Project would consume approximately 6,901 mw-h/year (net after the removal of the existing auto dealership uses), which is a reduction of approximately 939 mw-h/year when compared to the analysis contained in the certified EIR. Thus, no new impacts related to electricity would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to electricity.

Table 6
Revised Electricity Demand

| Land Use | Size | Electricity Rates | Total (kw-h/yr) |
|--|------------|--------------------|--------------------|
| Existing | | | |
| Auto Dealership (to be removed) | 99,399 sf | 12.95 kw-h / sf | (1,287,217) |
| Existing Subtotal (to be removed) | | | (1,287,217) |
| Proposed | | | |
| Residential | 516 DU | 5,626.50 kw-h / DU | 2,903,274 |
| Grocery Store | 35,000 sf | 53.30 kw-h/sf | 1,865,500 |
| Retail | 46,000 sf | 13.55 kw-h/sf | 623,300 |
| Restaurant | 18,000 sf | 47.45 kw-h/sf | 854,100 |
| Creative Office | 150,000 sf | 12.95 kw-h / sf | 1,942,500 |
| Proposed Subtotal | | | 8,188,674 |
| Total (Proposed – Existing) | | | 6,901,457 |
| <i>sf = square feet; kw-h = kilowatt-hour; yr = year</i> <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate</i> <i>The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i> <i>Table: CAJA Environmental Services, August 2016.</i> | | | |

Natural Gas

With the Project modifications discussed above, the Project remains the same size (807,200 square feet) with the same number of residential units (516). Thus, there would be no change in the amount of residential natural gas consumed at the Project Site beyond what was contemplated in the certified EIR. The changes in square footage would affect the commercial natural gas consumption. As shown in Table 7 below, with the proposed modifications, the Project would consume approximately 2,267,277 cf/mo (net after the removal of the existing auto dealership uses), which is a reduction of approximately 201,500 cf/mo when compared to the analysis contained in the certified EIR. Thus, no new impacts related to natural gas would result from implementation of the Project with the proposed modifications.

Therefore, with regard to the criteria set forth in CEQA Guidelines Section 15162(a), the changes proposed would not result in any new significant impact with respect to natural gas.

Table 7
Revised Natural Gas Demand

| Land Use | Size | Natural Gas Rates | Total (cf/mo) |
|-----------------|------|-------------------|---------------|
| Existing | | | |

**Table 7
Revised Natural Gas Demand**

| Land Use | Size | Natural Gas Rates | Total (cf/mo) |
|--|-------------|--------------------------|----------------------|
| Auto Dealership (to be removed) | 99,399 sf | 2.9 cf / sf | (288,257) |
| Existing Subtotal (to be removed) | | | (288,257) |
| Proposed | | | |
| Residential | 516 DU | 4,011.5 cf / DU | 2,069,934 |
| Grocery Store | 35,000 sf | 2.9 cf / sf | 101,500 |
| Retail | 46,000 sf | 2.9 cf / sf | 133,400 |
| Restaurant | 18,000 sf | 2.9 cf / sf | 52,200 |
| Creative Office | 150,000 sf | 2.0 cf / sf | 300,000 |
| Proposed Subtotal | | | 2,555,534 |
| Total (Proposed – Existing) | | | 2,267,277 |

sf = square feet; cf = cubic feet; mo = month
 Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
 The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
 Table: CAJA Environmental Services, August 2016.