



**COMMUNITY DEVELOPMENT COMMISSION/
HOUSING AUTHORITY**
of the County of Los Angeles

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Executive Director

August 07, 2018

The Honorable Board of Commissioners
Community Development Commission
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Commissioners:

**APPROVAL OF FUNDING AND ENVIRONMENTAL DOCUMENTATION FOR
THE 433 VERMONT APARTMENTS MULTIFAMILY AFFORDABLE HOUSING DEVELOPMENT IN
THE CITY OF LOS ANGELES
(DISTRICT 2) (3 VOTE)**

SUBJECT

This letter recommends that your Board approve a loan of up to \$1,500,000 to fund one affordable multifamily rental housing development. The allocation recommended in this action is for the 433 Vermont Apartments project, selected through the Notice of Funding Availability (NOFA) for Affordable Multifamily Rental Housing, Round 23-A, issued by the Community Development Commission (Commission).

IT IS RECOMMENDED THAT THE BOARD:

1. Acting as a responsible agency pursuant to the California Environmental Quality Act (CEQA), certify that the Commission has considered the attached Environmental Impact Report (EIR) for the Vermont Corridor project, which was prepared by the County of Los Angeles as lead agency; find that the mitigation measures identified in the Mitigation Monitoring and Reporting Plan (MMRP) are adequate to avoid or reduce potential impacts below significant levels; and find that the significant unavoidable adverse impacts are acceptable and outweighed by the social, economic and other benefits identified and adopted by the lead agency.
2. Approve the loan to Meta Housing Corporation using up to \$1,500,000 in County Affordable Housing Funds for the 433 Vermont Apartments affordable housing development.
3. Authorize the Executive Director, or designee, to negotiate, execute, and if necessary, amend, or

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

1-D August 7, 2018

CELIA ZAVALA
ACTING EXECUTIVE OFFICER

reduce the loan agreement with Meta Housing Corporation, or their Commission-approved designee, and all related documents, including but not limited to documents to subordinate the loan to construction and permanent financing, and any intergovernmental, interagency, or inter-creditor agreements necessary for the implementation of the development, following approval as to form by County Counsel.

4. Authorize the Executive Director, or designee, to incorporate, as needed, up to \$1,500,000 in County Affordable Housing Funds into the Commission's approved Fiscal Year 2018-2019 budget on an as-needed basis and included in future Fiscal Year budgets accordingly, for the purposes described herein.

5. Authorize the Executive Director, or designee, to reallocate Commission funding set aside for affordable housing at the time of project funding, as needed and within the project's approved funding limit, in line with project needs, and within the requirements for each funding source.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

As a result of NOFA Round 23-A, a total of 20 projects were recommended for funding. Nineteen of the NOFA 23-A projects were previously approved by your Board on February 20, 2018, March 13, 2018, May 8, 2018, June 19, 2018, and July 3, 2018. The final remaining project, 433 Vermont Apartments, is being recommended to your Board for approval at this time.

The project seeking approval through this action is a multifamily affordable housing development that will provide 72 new housing units, of which 36 units will be set aside for frequent users of the Department of Health Services (DHS) system, 35 units for general low-income seniors, and one unit for an onsite manager.

Approval is requested to ensure that the housing development project has funding necessary to develop the identified units.

FISCAL IMPACT/FINANCING

The recommended loan will provide up to \$1,500,000 in County Affordable Housing Funds. This amount will be incorporated into the Commission's approved Fiscal Year 2018-2019 budget on an as-needed basis and included in future Fiscal Year budgets accordingly.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

On September 12, 2017, a total of \$64,600,000 in Affordable Housing Trust Funds was made available for NOFA Round 23-A for affordable housing construction activities, which included \$39,600,000 in County Affordable Housing Funds, of which \$9,200,000 are Measure H Funds, and \$25,000,000 in Mental Health Housing Funds.

A total of 20 projects were selected through NOFA Round 23-A. Ten of the selected projects qualified for Mental Health Housing Funds, with total demand exceeding the initial allocation. On January 16, 2018, in order to fully fund these 10 projects, the Board authorized the Commission to backfill the shortfall with a combination of Mental Health Housing Funds initially reserved for a future NOFA and available Affordable Housing Trust Funds.

Of the 20 projects selected through NOFA Round 23-A, 19 were previously approved by your Board

on February 20, 2018, March 13, 2018, May 8, 2018, June 19, 2018, and July 3, 2018. The final remaining project, 433 Vermont Apartments, is being recommended to your Board for approval at this time.

The loan agreement and related documents will incorporate affordability restrictions, target assisted populations, and contain provisions requiring the developer to comply with all applicable federal, state, and local laws. The loan will be evidenced by a promissory note and secured by a deed of trust, with the term of affordability enforced by a recorded regulatory agreement. Approval of this project will leverage approximately \$47.6 million in additional external funding sources.

The loan agreement and related documents for this project will reflect the respective Special Needs set-asides and indicate that the assisted units will be affordable to households earning no more than 30% of the median income for the Los Angeles-Long Beach Metropolitan Statistical Area, adjusted for family size, as established by the U.S. Department of Housing and Urban Development. The loan agreement will require that the affordable housing units be set aside for a period of 55 years. Subject to various underwriting requirements, the developer may be required by the Commission or other lenders to create a single asset entity to designate ownership of the project. This "designee" will be a Commission-approved single asset entity created by the developer prior to execution of the loan agreement and all related loan documents.

This letter also recommends that the Executive Director have the authority to reallocate funds set aside for affordable housing development at the time of project funding to better align project funds with available resources. Any reallocation of funds will be made within the project's approved funding limit, in line with project needs, and within the requirements for each funding source.

ENVIRONMENTAL DOCUMENTATION

As a responsible agency, and in accordance with the requirements of CEQA, the Commission reviewed the EIR prepared by the County of Los Angeles for the Vermont Corridor project, which includes the scope of the 433 Vermont Apartments project, and determined that the project will have significant unavoidable adverse impacts on air quality, noise and transportation. The County of Los Angeles has adopted a Statement of Overriding Considerations finding that the significant unavoidable impacts are acceptable and outweighed by the social, economic and other benefits of this project. The Commission's consideration of the EIR and filing of the Notice of Determination satisfy the State CEQA Guidelines as stated in Article 7, Section 15096.

Environmental documentation for the proposed project is enclosed.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The requested action will increase the supply of Special Needs and affordable housing units in the County of Los Angeles.

The Honorable Board of Commissioners

8/7/2018

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Monique King-Viehlend". The signature is fluid and cursive, with a large initial "M" and "K".

MONIQUE KING-VIEHLAND

Executive Director

MKV:LK:ph

VERMONT CORRIDOR PROJECT

Final Environmental Impact Report

State Clearinghouse No. 2017051013

Lead Agency:

County of Los Angeles

c/o Community Development Commission

County of Los Angeles

700 West Main Street

Alhambra, CA 91801

May, 2018

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1.0 INTRODUCTION

Pursuant to the California Environmental Quality Act (“CEQA”), the potential environmental effects of the proposed Vermont Corridor Project (the “Project”) have been analyzed in a Draft Environmental Impact Report (“Draft EIR”) (SCH No. 2017051013), dated November 2017. This document contains the Final Environmental Impact Report (“Final EIR”), as prepared by the Lead Agency, which is the County of Los Angeles, by its Community Development Commission (“CDC”).

Section 15132 of the State CEQA Guidelines lists the contents of the Final EIR:

- a) The Draft EIR or a revision of the Draft EIR.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

One purpose of the Final EIR is to respond to all comments received by the Lead Agency regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications/corrections to the text, tables, figures, and appendices of the Draft EIR generated either from responses to comments, or independently by the Lead Agency, are stated in the Final EIR in Section 4.0.

The Responses to Comments (Section 2.0 in this Final EIR) and related appendices include copies of all letters received during and after the close of the Draft EIR public review period, as described further below, as well as the responses to all comments received on environmental issues.

Section 15097 of the State CEQA Guidelines states that the Lead Agency shall adopt a program for monitoring or reporting on the revisions that it has required for the project and the measures it has imposed to mitigate or avoid significant environmental effects. Section 3.0, Mitigation Monitoring and Reporting Program (“MMRP”), describes the mitigation program to be implemented by the Lead Agency.

1.1 CEQA PROCESS AND PUBLIC REVIEW OF THE DRAFT EIR

The CDC initiated the County’s CEQA review process for the Project through the issuance of a Notice of Preparation (“NOP”) as required by CEQA Guidelines Section 15082. The NOP for the Project EIR was prepared by the CDC, and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on May 4, 2017. The NOP was also distributed to owners and occupants of properties located within 500 feet of the Project Sites, and included instructions for obtaining a translated version of the NOP in Spanish or Korean. The NOP solicited comments from responsible and trustee agencies, as well as interested parties, on the scope of the EIR. The NOP was circulated for a 30-day scoping period that ended on June 5, 2017. A public scoping meeting was held on May 25, 2017. Spanish and Korean translation services were available at the meeting.

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. On November 3, 2017, a Notice of Completion (“NOC”) and Availability (“NOA”) of the Draft EIR, and a notice of the Draft EIR Community Meeting was prepared and distributed to the State Office of Planning and Research, the Los Angeles County Clerk, responsible and

trustee agencies, organizations, interested parties, and all parties who requested access to a copy of the Draft EIR in accordance with CEQA. The NOC/NOA was also distributed to owners and occupants of properties located within 500 feet of the Project Sites, and included instructions for obtaining a translated version of the NOC/NOA in Spanish or Korean. The Lead Agency provided a voluntary extension beyond the CEQA-mandated 45-day public review period to provide ample opportunity and time for the public to review the Draft EIR. Thus, comments on the Draft EIR were initially accepted during a 50-day public review period extending from Friday, November 3, 2017 through to Friday, December 22, 2017.

Subsequently, but during this review period, because the original notice contained an error in the website address for accessing the Draft EIR, which could have affected access for some users, depending on their search engine, the notice was revised and re-sent on November 30, 2017 to all parties that had been provided the original notice, and the public review period was extended to January 19, 2018 to provide a total 78-day public review period due to this unusual circumstance.

The NOC/NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (“NOP”) for the scoping stage of the Project before issuance of the Draft EIR, and was augmented to include individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOC/NOA and Draft EIR were posted on the Lead Agency’s website for viewing and downloading at:

<https://www.lacdc.org/>.

Printed copies of the Draft EIR were made available for public viewing at the following locations:

- Felipe de Neve Branch Library, 2820 W. 6th Street, Los Angeles, CA 90057
- Pico Union Branch Library, 1030 S. Alvarado Street, Los Angeles, CA 90006
- Pico-Koreatown Branch Library, 694 S. Oxford Avenue, Los Angeles, CA 90005
- Wilshire Branch Library, 149 N. Saint Andrews Place, Los Angeles, CA 90004
- Community Development Commission, County of Los Angeles, 700 West Main Street, Alhambra, CA 91801

A community meeting to provide a Project overview and conclusions of the DEIR and status of the review process was conducted by County staff and consultants on November 28, 2017 from 5:00 p.m. to 7:00 p.m. at the Los Angeles County Department of Mental Health Building, 550 South Vermont Avenue, Los Angeles, CA 90020. There were nine attendees from the public at the meeting. The notice for this meeting stated that attendance at this public meeting was voluntary, and was not required in order to submit comments on the Draft EIR. Spanish and Korean translation services were available at the meeting.

In summary, the Lead Agency conducted all required noticing and scoping for the Project in accordance with the requirements of Section 15083 of the State CEQA Guidelines, and conducted the public review for the Draft EIR in compliance with the requirements of Section 15087 of the State CEQA Guidelines. The community meeting, as well as the initial extension of the public review period exceeded the requirements of CEQA.

During the comment period, as well as during the community meeting, comments on the Draft EIR were received by the Lead Agency. The Lead Agency has reviewed all comments, and has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft EIR and/or in the Responses to Comments; Mitigation Monitoring and Reporting Program; and Revisions, Clarifications, and Corrections on the Draft EIR.

The Draft EIR concludes that based on the analysis in Section 4.0 (Environmental Impact Analysis) of the Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts relative to:

- Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG);
- Noise (construction noise); and
- Transportation (10 peak hour impacts at seven intersections at buildout) and cumulative construction traffic.

The Final EIR for the Project, dated May 2018, consists of the following documents:

- Draft EIR and Technical Appendices dated November 2017
- Responses to Comments, Mitigation Monitoring and Reporting Program; and Revisions, Clarifications, and Corrections on the Draft EIR, which includes:
 - A list of all persons, organizations, and public agencies that commented as well as the verbatim comments received on the Draft EIR; and
 - Responses to written comments on the Draft EIR.

This document includes the State Clearinghouse letter that documents compliance with CEQA review requirements; comment letters as provided by persons, organizations, and public agencies; community comments provided during the November 28, 2017 public meeting; and the Lead Agency's responses to all comments.

Next Procedural Steps

The County Board of Supervisors is required to consider and certify a Final EIR only if it exercises its discretion to approve the Project in the future. The Final EIR, and related documents will be filed, along with the County staff's recommendations related to the Project, for consideration by the Board of Supervisors on a future Board of Supervisors agenda. Consideration of recommendations relating to the Project will be publicly noticed as required by state law.

Members of the public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: <http://bos.lacounty.gov/Board-Meeting/Board-Agendas>. This site has an email notification service enrollment process for copies of future Board of Supervisors agendas. The Final EIR document will be posted for viewing and download with the previously posted Draft EIR prior to the County's consideration of the Final EIR and Project recommendations on the same website noted above for the posting of the Draft EIR: <https://www.lacdc.org/>. Printed copies of the Final EIR will be provided for public viewing at the same publicly accessible locations used for the distribution of the Draft EIR.

1.2 PROJECT DESCRIPTION

The Project includes the updated re-development and occupancy of three County-owned properties located in the "Vermont Corridor", which is identified as the area located on South Vermont Avenue between 4th Street and 6th Street, in the City of Los Angeles (the "City"). The three County-owned sites are collectively referred to as the "Project Sites", and are generally located at the following addresses: Site 1, located at 510, 526, and 532 South Vermont Avenue and 523 Shatto Place; Site 2, located at 550 South Vermont Avenue and 3175 West 6th Street; and Site 3, located at 433 South Vermont Avenue (see Table 1-1 for complete addresses). The Vermont Corridor is home to over a half million square feet of

County-owned office space, and over a half million square feet of County-leased office space. County departments assigned to these spaces are the Department of Mental Health (“DMH”), Department of Parks and Recreation (“DPR”), and Workforce Development, Aging and Community Services (“WDACS”) (collectively “Departments”). To promote improved efficiency, reverse blight in the area, and promote redevelopment of the County-owned properties and surrounding areas, the County intends to consolidate Departments’ locations within new office facilities, and relocate employees accordingly. Further, the aged facilities occupy prominent parcels that offer potential opportunities for economic revitalization through their redevelopment that would also provide additional public benefits and aesthetic enhancement for the surrounding community.

Project Location

The Project's Site 1, Site 2, and Site 3 are shown in Figure 3-1, Regional and Project Vicinity Map, and Figure 3-2, Aerial View of the Project Sites in the Draft EIR. Site 1 is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site 2 is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site 3 is a rectangular, approximately 21,700 square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street. All three sites are located in the City. The Project Sites are comprised of the addresses and assessor parcel numbers (“APNs”), and the existing uses listed in Table 1-1, Project Site Addresses and Assessor Parcel Numbers.

Table 1-1
Project Site Addresses and Assessor Parcel Numbers

Site No.	Address	APN	Existing Use
1	500, 510, 526, 532 S. Vermont Avenue 523, 531 S. Shatto Place	5077-003-905 5077-003-904 5077-003-903 5077-003-901	County Office, Surface Parking, Parking Structure
2	540, 542, 550 S. Vermont Avenue 3175 W. 6 th Street	5077-003-902	County Office Parking Structure
3	427, 433 S. Vermont Avenue	5502-009-900 5502-009-901	County Office Parking Lot

Source: Los Angeles County Facilities, Inc., 2016.

Regional access to the Project Sites is provided by the Santa Monica Freeway (“I-10”), approximately 1.75 miles to the south, and the Hollywood Freeway (“US-101”) approximately 1.1 miles north of the Project Sites. Local access to the Project Sites is provided by, but is not limited to, Vermont Avenue, 6th Street, and Wilshire Boulevard. The Project Sites are served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately 700 feet south of Site 2, 1,000 feet south of Site 1, and 1,700 feet south of Site 3. The Metro Red and Purple Lines provide access to the regional rail transit system, including the Metro Blue, Gold, Orange and Exposition Lines, and to regional and commuter rail lines, including Metrolink and Amtrak, through Union Station. The Project Sites are also served by Metro, DASH, and Foothill Transit bus lines, including Metro Local 20 and Metro Rapid 720, which run on Wilshire Boulevard, and Metro Local 204 and Metro Rapid 754, which run on Vermont Avenue.

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building assigned to DPR, open parking areas, and carport in the north parking area, and an existing parking structure located at 523 Shatto Place that is connected to the site. Site 2 is currently occupied by two office buildings, which house DMH and WDACS staff, respectively. Site 3 is currently occupied by an office building assigned to DPR.

Land Use Regulation

Sites 1, 2, and 3 are located in the City of Los Angeles Wilshire Community Plan area, with a “Community Commercial” land use designation. The Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing 523 Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 2 and 3 are zoned C2-1.

The Project Sites are all located in a “Transit Priority Area” as defined by California Public Resources Code (“PRC”) Section 21099 because they are located within one-half mile of an existing rail transit station (Wilshire/Vermont Metro Rail Red/Purple Line Station). The Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. The Project is an infill development comprised of a new County office building and parking structure on Site 1, redevelopment of the existing County office building on Site 2 into residential units, along with a new mixed-use building and parking structure, and a new senior affordable housing project and community recreation center on Site 3. The Site 1 office building and associated parking structure is proposed on a property zoned for commercial uses with a floor area ratio (“FAR”) that exceeds 0.75 to 1 and, therefore, qualifies as an “Employment Center Project” as defined by PRC Section 21099(a)(1).

Site 1 is located in the City of Los Angeles, but the property is owned by the County and would be developed for County use, and thus, is not subject to City of Los Angeles' land use regulations, pursuant to California state law including Government Code Section 53090 et. seq. Although exempt from City of Los Angeles building and zoning requirements, Site 1 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review the proposed development on Site 1 for consistency with the County General Plan.

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would be constructed on County land for mixed use residential and commercial development under a ground lease. Development of Site 2 would be subject to the City of Los Angeles General Plan, Zoning Ordinance and building regulations.

Site 3 is located in the City of Los Angeles, on land owned by the County. Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with an affordable housing developer, and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit. Although exempt from City of Los Angeles building and zoning requirements, Site 3 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review the proposed development on Site 3 for consistency with the County General Plan.

Proposed Development

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail (see Table 1-2, Project Summary Development, below). DPR employees located on Site 1 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 1. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helicopter landing facility ("EHLF")), and would consist of 21 total stories (13 office floors over an eight-story parking structure (seven levels above grade and one level at grade)). County Code Section 2007.9 requires an EHLF to be included in buildings over 12 stories, or 120 feet above the lowest level of Fire Department access. The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. In addition, a new parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place. This new structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. The new parking structure would be up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room). A total of 135 bicycle storage spaces (7 short-term and 128 long-term) would be provided on Site 1.

When complete, the new 21-story office building would accommodate the relocation of the 973 DMH employees currently located in the existing 12-story building on Site 2, the 250 WDACS employees currently located in the existing four-story building on Site 2, and an additional 840 DMH employees currently located in leased facilities within four miles of the new office building. Accordingly, a total of up to 2,063 County employees would be located on Site 1 when the office building is expected to open in 2021.

In order to provide the capability of meeting the County's future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. In addition, an estimated 27 new employees associated with the new retail uses would be located on Site 1.

Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Project Site. The majority of these employees would be relocated from existing County offices within the Project area.

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity (see Table 1-2, Project Summary Development, below). Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing DMH building, as well as new exterior building facades. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. The development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5

levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Retail uses on Site 2 would be located along Vermont Avenue and 6th Street. The residential units on Site 2 would be accessed from a lobby facing Vermont Avenue, with secondary access from a new plaza area that would front on 6th Street. The existing repurposed building would be connected to the new mixed-use building via a sky bridge on the 4th floor. Ingress and egress to the new parking structure would be provided from 6th Street. The new residential units would be accessed directly from the parking garage, while the converted units in the existing building would connect to the new parking garage via the 4th floor sky bridge.

Development on Site 2 would generate approximately 30 new employees, while the existing approximately 1,223 employees presently located on Site 2 would relocate to Site 1. Construction on Site 2 would not commence until the completion of the Site 1 development, and following the relocation of the 973 DMH employees currently located in the existing DMH building on Site 2, and the 250 WDACS employees currently located on Site 2 into the new Site 1 building.

As previously discussed, proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet within the existing DMH building into 172 residential units. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area. At this average household size, the Site 2 would be expected to accommodate approximately 618 new residents. Buildout of Site 2 is expected by 2023.

Site 3

Proposed development on Site 3 would involve removal of the existing DPR building and construction of a new 80,837 square foot, six-story, 100 percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces (see Table 1-2, Project Summary Development, below). DPR employees on Site 3 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 3. The entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. In addition, 81 long term and 21 short-term bicycle parking spaces would be provided on the ground floor. A landscaped courtyard, open to the sky, would be provided on the second level of the Project to serve the Project residents, and would be surrounded by the upper floor units. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area. Based on this average household size, the Project would be expected to accommodate approximately 181 new residents on Site 3 as shown in Table 1-2.

**Table 1-2
Project Development Summary**

Use	Size
Development	
Site 1	
<i>Existing</i>	
County Office	30,788 sf
County Office (Vacant)	13,325 sf
Employees	93 employees
<i>Proposed</i>	
County Office	471,000 sf
Retail	6,350 sf
Restaurant	3,650 sf
Employees	2,193 employees
Site 2	
<i>Existing</i>	
County Office (Occupied)	154,793 sf
County Office (Occupied)	52,000 sf
Employees	1,223 employees
<i>Proposed</i>	
Residential (Reuse)	172 units
Retail (Reuse)	4,100 sf
Amenity (Reuse)	8,875 sf
Residential (New Construction)	74 units
Retail (New Construction)	3,400 sf
Amenity (New Construction)	2,250 sf
Employees	30 employees
Residents	618 residents
Site 3	
<i>Existing</i>	
County Office	29,292 sf
Employees	112 employees
<i>Proposed</i>	
Senior Affordable Housing	72 units
Community Recreation Center	13,200 sf
Employees	46 employees
Residents	181 residents
Parking Spaces	
Site 1	
<i>Existing</i>	
Parking Structure	864
Surface Parking Lots	99
Vacant Office Building	41
<i>Total Existing</i>	1,004
<i>Proposed</i>	
New Office Building	965
New Shatto Place Parking Structure	768
<i>Total Proposed</i>	1,733
Site 2	

**Table 1-2
Project Development Summary**

Use	Size
<i>Existing</i>	
<i>Parking Structure</i>	53
<i>Proposed</i>	
<i>Parking Structure</i>	263
Sites 1 & 2 Total Parking Spaces	
<i>Existing</i>	1,057
<i>Proposed</i>	1,996
Site 3	
<i>Existing</i>	65
<i>Proposed</i>	116
Bicycle Storage	
Site 1	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	7
<i>Long-Term</i>	128
Site 2	
<i>Existing</i>	
<i>Short-Term</i>	5
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	30
<i>Long-Term</i>	260
Site 3	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	21
<i>Long-Term</i>	81
Total Existing Bicycle Storage	5
Total Proposed Bicycle Storage	527
<i>Source: Los Angeles County Facilities, Inc., 2016.</i>	

Project Construction

Construction on Site 1 and relocation of existing County employees to the new office building on Site 1 is required before the conversion of the existing building and construction of the new mixed-use building on Site 2 may commence. Site 3 construction would be independent of the Site 1 and Site 2 construction activities, but will occur during the construction on Site 1. Accordingly, the Project was evaluated in the Draft EIR as a two-phased project.

Phase I of the Project would include construction of the new County office building, retail uses, and parking structure on Site 1, and construction of new senior affordable housing and community recreation

center on Site 3. Current County employees on Sites 1 and 3 would be relocated to offsite facilities prior to the commencement of construction. Site 1 construction is anticipated to begin in the summer of 2018, and would take place over a period of approximately 36 months, with occupancy anticipated to be complete in the summer of 2021. Construction on Site 3 is anticipated to commence in the summer of 2019, and be completed and occupied in 2020.

Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2. Current County employees on Site 2 will be relocated to the completed Site 1 office building prior to the commencement of construction activities on Site 2. Construction on Site 2 is anticipated to commence in the fall of 2021 and be completed and occupied in late 2023.

Actions Required

County of Los Angeles

The Project Sites are located entirely in the City of Los Angeles, but are owned by the County. The County, by its CDC, is the Lead Agency for the Project. Discretionary approvals from the County would be necessary to implement the Project on all Project Sites. Discretionary actions to be considered by the County include, but may not be limited to, the following:

- Certification of the EIR;
- Adoption of required findings and approval of the Project as described in the EIR;
- Approval of Project financing, including bond issuance;
- Approval of ground leases and option to ground leases, or comparable agreements for financing; and
- Other approvals as needed and may be required.

The County would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 1 and Site 3. Although exempt from City of Los Angeles building and zoning requirements, Site 1 and Site 3 development would be required to comply with County Building Code and State Fire Marshal requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. In addition, the development on Sites 1 and 3 will be reviewed by the County Department of Regional Planning for consistency with the County General Plan.

City of Los Angeles

Proposed development on Site 2 would be subject to the zoning and building regulations of the City of Los Angeles. As an agency with discretionary approval authority over the Project on Site 2, the City is a Responsible Agency under CEQA Guidelines Sections 15381 and 15096. Discretionary actions to be considered by the City include, but may not be limited to, the following:

- Consider the environmental effects of the Site 2 Project as shown in the EIR; and
- Approvals and permits for the Site 2 Project under the Adaptive Reuse Incentive Areas Specific Plan, and other City entitlements that may be required to authorize new Site 2 construction.

The City would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 2. Off-site ministerial permits that may be required at all three Project Sites, including but not necessarily limited to, connection to off-

site utilities, any necessary work/improvements within the public right-of-way, and any off-site mitigation would be within the City's jurisdiction.

1.3 SUMMARY OF ENVIRONMENTAL IMPACTS

An Initial Study was not prepared for the Project as permitted by CEQA Guidelines Section 15060(d) because the Lead Agency determined it would require an environmental impact report for the Project rather than a mitigated negative declaration. The Draft EIR evaluates the environmental impacts associated with Project implementation. Based on agency and public comments in response to the NOP and a review of environmental issues, the Draft EIR includes analyses of the following environmental topics as set forth in CEQA Guidelines Appendix G:

- Aesthetics (Aesthetics/Views, Shade/Shadow, Light/Glare)
- Air Quality
- Cultural Resources (Historical Resources, Archaeological Resources, Paleontological Resources)
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Housing, and Employment
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

Potential environmental effects in the areas of Agricultural Resources, Biological Resources, and Mineral Resources, as well as other specific areas related to the topics listed below, were determined to be either less than significant or no impact, or not applicable, and, therefore, are not evaluated in greater detail in the EIR. These areas are addressed in Section 6.5, Effects Not Found to be Significant, of the Draft EIR.

- Aesthetics (scenic vistas, views from trails, scenic resources within a State scenic highway)
- Agriculture and Forest Resources (all subtopics)
- Air Quality (objectionable odors)
- Biological Resources (all subtopics)
- Geology and Soils (surface rupture along known faults, landslides, erosion, expansive soil, septic tanks/wastewater treatment, conflicts with hillside management area ordinance)
- Hazards and Hazardous Materials (routine use of hazardous materials, airports, interference with emergency response, fire hazards)
- Hydrology and Water Quality (mosquito habitat, pollutant discharge into areas of Special Biological Significance, wastewater treatment, 100-Year flooding, seiche/tsunami/mudflow)
- Land Use (division of a community)
- Mineral Resources (all subtopics)
- Noise (proximity to airports)
- Population, Housing, and Employment (displacement of housing, displacement of people)

- Recreation (regional open space connectivity)
- Transportation and Traffic (air traffic patterns)

The Draft EIR analysis in Section 4.0 (Environmental Impact Analysis), indicates that implementation of Project Design Features, Regulatory Requirements, and Mitigation Measures would result in the Project having the following impacts reduced to a level of less than significant:

- Aesthetics;
- Cultural Resources;
- Energy;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Land Use and Planning;
- Population, Housing, and Employment;
- Public Services;
- Recreation;
- Tribal Cultural Resources; and
- Utilities and Service Systems.

Based on the analysis in Section 4.0 (Environmental Impact Analysis) of the Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts after implementation of feasible mitigation measures relative to:

- Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG);
- Noise (construction noise); and
- Transportation (10 peak hour impacts at seven intersections at buildout) and cumulative construction traffic.

2.0 RESPONSE TO COMMENTS

Upon completion of the Draft EIR, notice of the public review period was given in accordance with Section 15087 of the State CEQA Guidelines. On November 3, 2017, a Notice of Completion (“NOC”) and Availability (“NOA”) of the Draft EIR, and a notice of the Draft EIR Community Meeting was prepared and distributed to the State Office of Planning and Research, the Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, and all parties who requested access to a copy of the Draft EIR in accordance with CEQA. The NOC/NOA was also distributed to owners and occupants of properties located within 500 feet of the Project Sites, and included instructions for obtaining a translated version of the NOC/NOA in Spanish or Korean. The Lead Agency provided a voluntary extension beyond the CEQA-mandated 45-day public review period to provide ample opportunity and time for the public to review the Draft EIR. Thus, comments on the Draft EIR were initially accepted during a 50-day public review period extending from Friday, November 3, 2017 through to Friday, December 22, 2017.

Subsequently, but during this review period, because the original notice contained an error in the website address for accessing the Draft EIR, which could have affected access for some users, depending on their search engine, the notice was revised and re-sent on November 30, 2017 to all parties that had been provided the original notice, and the public review period was extended to January 19, 2018 to provide a total 78-day public review period due to this unusual circumstance.

The NOC/NOA was distributed to the mailing list and email list prepared for the Notice of Preparation (“NOP”) for the scoping stage of the Project before issuance of the Draft EIR, and was augmented to include individuals requested to be added to the list, as well as individuals who had provided comments on the NOP. The NOC/NOA and Draft EIR were posted on the Lead Agency’s website.

A community meeting to provide a Project overview and conclusions of the DEIR and status of the review process was conducted by County staff and consultants on November 28, 2017 from 5:00 p.m. to 7:00 p.m. at the Los Angeles County Department of Mental Health Building, 550 South Vermont Avenue, Los Angeles, CA 90020. There were nine attendees from the public at the meeting. The notice for this meeting stated that attendance at this public meeting was voluntary, and was not required in order to submit comments on the Draft EIR. Spanish and Korean translation services were available at the meeting.

Letters commenting on the information and analysis in the Draft EIR were received from various parties during the 78-day public review period (i.e., November 3, 2017 through January 19, 2018). A total of 12 comment letters were received, including eight letters from State, regional, and local agencies, one internal departmental memorandum from a County department, and three letters from organizations and individuals. Blank self-addressed comment cards were also made available for convenience during the public meeting held on November 28, 2017 at the Los Angeles County Department of Mental Health Building, along with Spanish and Korean translation services. The responses to all comments, including oral comments submitted at the November 28, 2017 public meeting, are provided below. Responses to State, regional, and local agencies are included in Section 2.1; responses to internal County department memoranda are included in Section 2.2; responses to organizations and individuals are included in Section 2.3; and responses to the public meeting comments are included in Section 2.4.

Section 15088 of the CEQA Guidelines states that “[t]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” The CEQA Guidelines call for responses that contain a “good faith, reasoned analysis” with statements supported by factual information. Some of the comments submitted to the Lead Agency, however, were general in nature, stating opinion either in favor

of or in opposition to the Project. In such cases, the comment is made a part of the administrative record and will be forwarded to the County's decision makers for their consideration.

In accordance with these requirements, this Chapter of the Final EIR provides a good faith, reasoned analysis and responds to each of the written comments on environmental issues received regarding the Draft EIR during the comment periods.

Each comment letter is provided first and is bracketed in the right margin, sequentially numbered (e.g., 1, 2). Following the bracketed comment letter, responses are presented in corresponding order to provide a matching numbered response on the pages following each comment letter.

2.1 STATE, REGIONAL AND LOCAL AGENCIES

Comment letters from State, regional and local agencies consisted of:

- State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
- State of California, Department of Transportation
- County of Los Angeles, Fire Department
- Los Angeles County Metropolitan Transportation Authority
- Los Angeles Department of Water and Power
- City of Los Angeles, Bureau of Sanitation, November 30, 2017
- City of Los Angeles, Bureau of Sanitation, December 14, 2017
- Los Angeles Unified School District

Responses to the comments in these letters are provided below, after each letter.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

January 22, 2018

Chris Lopez
Los Angeles County
700 West Main Street
Los Angeles, CA 90012

Subject: Vermont Corridor Project
SCH#: 2017051013

Dear Chris Lopez:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 19, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017051013
Project Title Vermont Corridor Project
Lead Agency Los Angeles County

Type EIR Draft EIR
Description Note: Extended Per Lead

Proposed development on Site 1 would involve removal of the existing County office building, vacant office building, surface parking lots, and parking structure, and construction of a new County Office building containing 471,000 square feet of office use and 10,000 square feet of ground floor retail over a 390,000 square foot parking structure containing 965 spaces, and 10,000 sf of ground floor retail and restaurant uses. Proposed development on site 2 would involve reuse and conversion of the existing 154,793 sf, 12-story county office building into a max of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 sf of ground floor retail, 1,375 sf of ancillary space (office, common area, etc.), and an approx 7,500 sf roof deck amenity. Proposed development on site 3 would involve removal of the existing county building and construction of a new 80,837 sf, six-story, 100 % senior affordable housing project containing 72 units, and an approx 13,200 sf community recreation center, over a three-story, 51,591 sf underground parking structure containing 116 spaces.

Lead Agency Contact

Name Chris Lopez
Agency Los Angeles County
Phone 626-586-1550 **Fax**
email
Address 700 West Main Street
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Los Angeles, City of
Region
Lat / Long 34° 06' 50" N / 118° 17' 20" W
Cross Streets Vermont Avenue, 6th Street, 4th Street
Parcel No.

Township	Range	Section	Base

Proximity to:

Highways I-10,US-101,CA-110
Airports
Railways Metro Rail Red/Purple
Waterways
Schools Various
Land Use county office/C2-1/Community commercial

Project Issues Air Quality; Archaeologic-Historic; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Housing; Job Generation; Landuse; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Social; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wildlife; Cumulative Effects; Aesthetic/Visual; Tribal Cultural Resources

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Cal Fire; Caltrans, District 7; Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Document Details Report
State Clearinghouse Data Base**

Date Received 11/03/2017

Start of Review 11/03/2017

End of Review 01/19/2018

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-6536
 FAX (213) 897-1337
 www.dot.ca.gov

clear 01/19/2018

E



*Serious drought.
 Help save water!*

December 14, 2017

Governor's Office of Planning & Research

DEC 19 2017

Mr. Chris Lopez
 Community Development Commission, County of Los Angeles
 700 West Main Street
 Alhambra, CA 91801

STATE CLEARINGHOUSE

RE: Vermont Corridor Project
 Vic. LA-101/PM 4.228
 SCH#2017051013
 GTS#07-LA-2017-01207ME-DEIR

Dear Mr. Lopez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes the redevelopment of three Project Sites. Site one is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site two is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site three is a rectangular, approximately 21,700 square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street.

Based on review of the Draft Environmental Impact Report, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

However, please be mindful any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2017-01207ME.

Sincerely,


 MIYA EDMONSON
 IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter No. 1

State of California
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
Scott Morgan, Director, State Clearinghouse
1400 10th Street
P.O. Box 3044
Sacramento, CA 95812-3044
January 22, 2018

Response to Comment 1-1

This comment is a standard response from the State Clearinghouse of Planning and Research acknowledging the Draft EIR was sent to State agencies for review, and that the Draft EIR is in compliance with the State Clearinghouse review requirements for draft environmental documents. The comment forwards a letter from the State of California, Department of Transportation, District 7, Office of Regional Planning (see Comment Letter No. 2). The comments contained in this letter are responded to in Responses 2-1 and 2-2.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-6536
 FAX (213) 897-1337
 www.dot.ca.gov

Comment Letter No. 2



*Serious drought.
 Help save water!*

December 14, 2017

Mr. Chris Lopez
 Community Development Commission, County of Los Angeles
 700 West Main Street
 Alhambra, CA 91801

RE: Vermont Corridor Project
 Vic. LA-101/PM 4.228
 SCH#2017051013
 GTS#07-LA-2017-01207ME-DEIR

Dear Mr. Lopez:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Project proposes the redevelopment of three Project Sites. Site one is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site two is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site three is a rectangular, approximately 21,700 square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street.

1

Based on review of the Draft Environmental Impact Report, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

However, please be mindful any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

2

If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2017-01207ME.

Sincerely,


 MIYA EDMONSON
 IGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

Comment Letter No. 2

State of California
Department of Transportation
District 7-Office of Regional Planning
Miya Edmonson, IGR/CEQA Acting Branch Chief
100 South Main Street, MS 16
Los Angeles, CA 90012
December 14, 2017

Response to Comment 2-1

The comment accurately describes the Project as an introduction to the comments on the Draft EIR that follow. This comment also states that Caltrans does not expect Project approval to result in a direct adverse impact to the existing State transportation facilities. As indicated in the Draft EIR (page 4.14-52) based on the Project-only traffic volumes, the Project would not add 150 trips in a single direction to any freeway segment during either peak hour. Therefore, impacts to CMP mainline freeway segments would be less than significant which confirms the agency's statement.

Response to Comment 2-2

The comment states that transportation of heavy equipment and/or oversized vehicles on State highways requires a permit from Caltrans and recommends that such activity be limited to off-peak commute periods. The Project will comply with any Caltrans permit requirements regarding transportation of equipment or materials. As indicated in the Draft EIR (page 4.14-60), Regulatory Requirement RR TR-1: Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible.



COUNTY OF LOS ANGELES

Comment Letter No. 3

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

November 29, 2017

Chris Lopez, Development Specialist
County of Los Angeles
Community Development Commission
700 West Main Street
Alhambra, CA 91801

Dear Mr. Lopez:

**NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL
IMPACT REPORT, "VERMONT CORRIDOR PROJECT," RE-DEVELOPMENT AND
OCCUPANCY OF THREE COUNTY-OWNED PROPERTIES,
CITY OF LOS ANGELES, FFER 201700138**

The Notice of Completion/Availability of Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this department.

1

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER

BRADBURY
CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA

CUDAHY
DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLEN DORA
HAWAIIAN GARDENS

HAWTHORNE
HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA-FLINTRIDGE

LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA

LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT

PICO RIVERA
POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

LAND DEVELOPMENT UNIT:

The Fire Prevention Division, Land Development Unit, has no comments regarding the DEIR for this project at this time. Should any questions arise, please contact Juan Padilla at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

3

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Site Mitigation Unit (SMU) of the Health Hazardous Materials Division (HHMD) is currently providing environmental oversight for known environmental impacts at Project Site 1. SMU has no requirements regarding Project Sites 2 or 3 at this time; however, SMU will likely be providing oversight of environmental assessment activities to be conducted at Project Sites 2 and 3 in the near future. Due to the presence of inactive petroleum oil wells on Project Site 1 and near Project Site 2, the California Division of Oil Gas & Geothermal Resources will be involved with the Project development. Due to the presence of an abandoned underground storage tank (UST) on Project Site 1, the Cal-EPA Los Angeles Regional Water Quality Control Board will likely be involved with overseeing the future assessment of known fuel impacts at the abandoned UST location.

4

In addition, the City of Los Angeles Fire Department and the Los Angeles County Department of Public Works (LACDPW), Environmental Programs Division will initially have to work together to resolve UST oversight and permit authority issues applicable to the proposed project development. Lastly, the LACDPW Building & Safety Division and the City of Los Angeles Department of Building & Safety will initially have to work together to resolve methane gas mitigation permit authority issues applicable to the proposed project development.

5

If you have any questions regarding SMU voluntary environmental oversight pertaining to this project, please email perla.garcia@fire.lacounty.gov. Please reference #FFER201700138 in your email.

Chris Lopez, Development Specialist
November 29, 2017
Page 3

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in blue ink that reads "Michael Y. Takeshita". The signature is written in a cursive style with a long horizontal stroke at the end.

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

Comment Letter No. 3

County of Los Angeles, Fire Department
Daryl L. Osby, Fire Chief, Forester and Fire Warden
1320 North Eastern Avenue
Los Angeles, CA 90063
November 29, 2017

Response to Comment 3-1

The comment from the Planning Division states the property is entirely within the City of Los Angeles, which is not part of the emergency response area of the Los Angeles County Fire Department, and the Project does not appear to have any impact on the Department. As indicated in the Draft EIR (page 4.12-2) the Project Sites are located within the Los Angeles City Fire Department Central Bureau, and are served by Fire Station 6.

Response to Comment 3-2

The comment states the Fire Prevention Division, Land Development Unit has no comments regarding the Draft EIR.

Response to Comment 3-3

The comment from the Forestry Division states potential impacts to erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archaeology and cultural resources, and the County Oak Tree Ordinance; which are the statutory responsibility of the County of Los Angeles Fire Department’s Forestry Division, “should be addressed.” As shown below, each of these topics were thoroughly addressed in the Draft EIR and appropriate less than significant or no impact determinations were provided along with accompanying analysis.

Erosion Control

As indicated in the Draft EIR (page 6.5-6) the Project Sites are currently developed with office buildings and associated parking and the area surrounding the Project Sites is also completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by development at any of the Project Sites. During construction, grading and excavation would expose soils to potential erosion for a limited time; however, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. Accordingly, the Draft EIR determined that this impact would be less than significant (Section 6.5, Effects Found Not to be Significant).

Watershed Management and Rare and Endangered Species

As indicated in the Draft EIR (page 6.5-4) the Project Sites and the surrounding areas are urbanized with no open spaces, water bodies, or stream courses that would facilitate movement of migratory fish or wildlife. Thus, no suitable habitats exist on the Project Sites to support these sensitive natural communities (such as riparian habitat, coastal sage scrub, oak woodlands, unique native trees, or non-jurisdictional wetlands). Similarly, the Project would not interfere with or impede the movement or migration of any native resident or wildlife species. Accordingly, the Draft EIR determined that this impact would be less than significant (Section 6.5, Effects Found Not to be Significant).

The Project Sites are not located within any Wildflower Reserve Areas, Significant Ecological Areas, or Sensitive Environmental Resource Areas, or areas subject to the Los Angeles County Oak Tree Ordinance. In addition, there is no adopted State, regional, or local habitat conservation plan that is applicable to the Project Sites or the surrounding areas. Given the above, the Project would not impact any sensitive plant or wildlife species, either directly or through habitat modification, and it would not conflict with any local policies or ordinances protecting biological resources. Additionally, there are no federally or State protected wetlands, vernal pools, coastal wetlands, drainages, or waters of the U.S. located on or near the Project Sites. Accordingly, the proposed project would not have any impact, either, directly or through removal, filling, hydrological interruption, or other means, on these sensitive natural resources.

As indicated in the Draft EIR (page 6.5-4), none of the existing trees on the Project Sites contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, or by the California Department of Fish and Wildlife. Accordingly, the Draft EIR determined that this impact would be less than significant (Section 6.5, Effects Found Not to be Significant).

Vegetation and County Oak Tree Ordinance

As indicated in the Draft EIR (page 6.5-4), the Project Sites contain only Non-Protected Significant Trees as classified in the City's tree ordinance. There are no oak trees on the Project Sites. The on-site trees would be removed and replaced upon completion of construction. None of the existing trees on the Project Sites contain any habitat capable of sustaining any species identified as a candidate, sensitive, or special status species in local or regional plans, or by the California Department of Fish and Wildlife. Accordingly, the Draft EIR determined that this impact would be less than significant (Section 6.5, Effects Found Not to be Significant).

Fuel Modification For Very High Fire Hazard Severity Zones or Fire Zone 4

As indicated in the Draft EIR (page 6.5-7) the Project Sites are not located in a Very High Fire Hazard Severity Zone or any other high fire hazard area. Accordingly, the Draft EIR determined that this impact would be less than significant (Section 6.5, Effects Found Not to be Significant).

Archaeology and Cultural Resources

As indicated in the Draft EIR (pages 4.3.1-1 through 4.3.2-2), Project impacts related to historical resources would be less than significant. With the implementation of MM CU-1, which requires monitoring of grading activities by a professional archaeologist, Project impacts related to archaeological resources would be less than significant (Draft EIR, page 4.3.2-7).

Response to Comment 3-4

The comment states that the Site Mitigation Unit of the Health Hazardous Materials Division of the County Fire Department is providing environmental oversight to Site 1 and will likely provide oversight to Sites 2 and 3. The comment also states due to the location of inactive oil wells and underground storage tanks the California Division of Oil Gas & Geothermal Resources, and the Los Angeles Regional Water Quality Control Board will oversee future assessment of known fuel impacts. As indicated in the Draft EIR (page 4.7-31), Mitigation Measures MM HH-1 and MM HH-2 would require a final geophysical survey of the Project Sites and review of the surveys by the California Department of Conservation's Division of Oil, Gas, & Geothermal Resources (DOGGR), and the incorporation of all recommendations by the DOGGR. Furthermore, as indicated in the Draft EIR (page 4.7-31), Regulatory Requirement RR HH-6 provides that Site 1 development will comply with the requirements of Los Angeles County Fire Departments Health Hazardous Materials Division, Site Mitigation Unit concerning underground storage tanks. In addition, as

noted in the Draft EIR (pages 4.7-24 and 4.7-25), development of Sites 2 and 3 will be subject to existing federal and State laws regarding identified hazardous materials, and adherence to the enumerated Regulatory Requirements would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Response to Comment 3-5

The comment states the City of Los Angeles Fire Department and the Los Angeles County Department of Public Works, Environmental Programs Division, and the Los Angeles County Department of Public Works Building and Safety Division and City of Los Angeles Department of Building & Safety will have to work together on UST and methane gas permit issues. As noted in the Draft EIR (page 4.7-30), the Project will comply with existing County and City requirements related to USTs and methane gas permit requirements. It is expected that County and City agencies will continue to coordinate during this process as required.



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

January 19, 2018

Chris Lopez
Community Development Commission
County of Los Angeles
700 West Main Street
Alhambra, CA 91801

RE: Vermont Corridor Project - 510, 526, and 532 South Vermont Avenue; 550 South Vermont Avenue and 3175 West 6th Street; 433 South Vermont Avenue, Los Angeles – Notice of Availability of a Draft Environmental Impact Report

Dear Mr. Lopez:

Thank you for the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report for the Vermont Corridor Project located at 510, 526, and 532 South Vermont Avenue, 550 South Vermont Avenue, 3175 West 6th Street, and 433 South Vermont Avenue in the City of Los Angeles. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

1

Project Description

The Project proposes the redevelopment of each of the three Project Sites. Site 1 is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site 2 is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site 3 is a rectangular, approximately 21,700 square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street.

Metro Comments

Red Line Adjacency

It is noted that the Project site is in close proximity to the Metro Red Line subway tunnel. While Metro strongly supports development near transit, the following concerns related to the Project's proximity to the subway tunnel should be addressed:

1. The Project sponsor should be advised that the Metro Red Line subway may operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnel below the proposed Project.
2. The construction and operation of the proposed Project must not disrupt the operation and maintenance activities of the Metro Red Line or the structural and systems integrity of Metro's Red Line subway tunnels.
3. Considering the proximity of the proposed Project to the subway tunnel, it is expected that rail operations may produce noise and vibration. A recorded Noise Easement Deed in favor of Metro is required prior to the completion and/or occupancy of the Project, a form of which is attached. In addition, any noise mitigation required for the Project must be borne by the developers of the Project and not Metro. The easement recorded in the Deed will extend to successors and tenants, as well.
4. Consistent with ZI No. 1117, prior to the County issuing a building permit within 100 feet of the Metro Rail construction area, clearance shall be obtained from Metro. Metro Rail Engineering and Operations must review construction plans and operations prior to any permits being issued. Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations and architectural plans, sections, and elevations. Please refer to the attached Metro "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed building to the Metro existing structures.
5. Metro staff shall be permitted to monitor construction activity to ascertain any impact to the subway tunnel.
6. The Project sponsor should be advised that Metro may request reimbursement for costs incurred as a result of Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.
7. The Project sponsor will be required to notify Metro of any changes to the construction/building plans that may or may not impact the subway tunnel.
8. Aspet Davidian, Sr. Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the Project's potential impacts on Metro's Red Line station structures and tunnels.

2

Bus Stop Adjacency

Metro Lines 204 and 754 operate on Vermont Avenue, Line 18 operates on 6th Street, and the southern end of Line 201 loops around Vermont, 6th Street, and Shatto Place, adjacent to the proposed Project.

3

Each of these lines has a stop adjacent to the proposed Project. The following comments relate to bus operations and the bus stops:

1. Although the Project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 regarding construction activities that may impact Metro bus lines at least 30 days in advance of initiating construction activities. For closures that last more than six months, Metro's Stops and Zones Department will also need to be notified at 213-922-5190, 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks (and/or a scramble crosswalk), ADA-compliant curb and ramps, pedestrian lighting, and a continuous canopy of shade trees, as well as other amenities along all public street frontages of the development site. These amenities serve to improve pedestrian safety and comfort in accessing the nearby bus stops and rail station. The County should consider requiring the installation of such amenities as part of the conditions of approval for the Project.
4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

3 cont.

Vermont Bus Rapid Transit (BRT)

The Project sponsor should be aware that Metro is planning a Bus Rapid Transit (BRT) Project on Vermont Avenue between Hollywood Boulevard and 120th Street with an anticipated construction groundbreaking date of FY 2024. Improvements being considered include dedicated bus lanes, enhanced BRT stations with a number of passenger amenities, and frequent service. Please contact Lauren Cencic, Sr. Manager, Regional Transit Planning, at 213-922-7417 or cencicl@metro.net regarding this Project.

4

Transit Orientation

Considering the Project's location and proximity to numerous transit services, including two Metro Heavy Rail lines and numerous Metro Bus stops, Metro would like to identify the exceptional opportunities associated with transit-oriented development:

5

1. Metro supports development of commercial and residential properties near transit facilities and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of

developments. Metro encourages the City and County to be mindful of the Project's direct adjacency to the Metro Red and Purple Lines and numerous Metro bus stops.

2. Metro would like to inform the Project sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Business Transit Access Pass (B-TAP) programs which offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.
3. Given the high-density, walkable and transit-accessible urban setting, the Project appears to be providing excessive amounts of parking for private autos. The provision of excessive parking encourages driving, increasing traffic congestion, which impacts transit vehicle operation and pedestrian safety, and increases greenhouse gases and unhealthy exhaust fumes. Accordingly, Metro strongly encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies should most definitely be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.
4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved pedestrian and bike access to Wilshire/Vermont Red/Purple Line station. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, and other amenities along all of the site's public right-of-way frontages to improve pedestrian safety and comfort to access the nearby transit services. The City should consider requesting and the County should provide the installation of such amenities as part of the development of the site. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
6. Metro strongly encourages the promotion of bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for employees and guests. Additionally, the County should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as the Wiltern Theatre. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

5 cont.

Active Transportation

The Project applicant should coordinate with Metro Bike Share program for potential Bike Share station at this development. Additionally, the applicant should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as Wilshire/Vermont Station. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

6

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, Projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net.

Sincerely,



Derek Hull
Manager, Transportation Planning

Attachments: Adjacent Construction Design Manual
CMP Appendix D: Guidelines for CMP Transportation Impact Analysis
Noise Easement Deed

ADJACENT CONSTRUCTION DESIGN MANUAL

1.0 INTRODUCTION

- 1.1 Parties planning construction over, under or adjacent to a Metropolitan Transportation Authority (MTA) facilities or structures are advised to submit for review ~~seven (7)~~ **two (2) hard** copies **and one (1) electronic copy** of their **design** drawings and ~~four (4)~~ copies of their calculations showing the relationship between their project and the MTA facilities, for MTA review. The purpose of the MTA review is to reduce the chance of conflict, damage, and unnecessary remedial measures for both MTA and the parties. Parties are defined as developers, agencies, municipalities, property owners or similar organizations proposing to perform or sponsor construction work near MTA facilities.
- 1.2 Sufficient drawings and details shall be submitted at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review of the effects that the proposed project may or may not have on the MTA facilities. An MTA review requires internal circulation of the construction drawings to concerned departments (~~usually includes Construction, Operations, Maintenance, and Real Estate~~) **for MTA departments review**. Parties shall be responsible for all costs related to ~~MTA drawing reviews by MTA~~. MTA costs shall be based upon the actual hours taken for review at the hourly rate of pay plus overhead charges. Drawings normally required for review are:
- A. Site Plan
 - B. Drainage Area Maps and Drainage Calculations
 - C. Architectural drawings
 - D. Structural drawings and calculations
 - E. Civil Drawings
 - F. Utility Drawings
 - G. Sections showing Foundations and MTA Structures
 - H. Column Load Tables
 - I. Pertinent Drawings and calculations detailing an impact on MTA facilities
 - J. A copy of the Geotechnical Report.
 - K. Construction zone traffic safety and detour plans: Provide and regulate positive traffic guidance and definition for vehicular and pedestrian traffic adjacent to the construction site to ensure traffic safety and reduce adverse traffic circulation impact.
 - L. Drawings and calculations should be sent to:
MTA Third Party Administration (Permits Administration)
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

- 1.3 If uncertainty exists on the possible impacts a project may have on the MTA facilities, and before submitting a formal letter requesting a review of a construction project adjacent to the Metro System, the party or his agent may contact the MTA Third Party Administrator (Permits). The Party shall review the complexity of the project, and **contact MTA to** receive an informal evaluation of the amount of detail required for the MTA review. In those cases, whereby it appears the project will present no risk to MTA, the Third Party Administrator (Permits) shall immediately route the design documents to **Engineering**, Construction, Operations, Maintenance, and Real Estate departments for a preliminary evaluation. If it is then confirmed that MTA risk is not present, the Administrator shall process an approval letter to the party.
- 1.4 A period of 30 working days should be allowed for review of the drawings and calculations. Thirty (30) work days should be allowed for each successive review as required. It is noted that preliminary evaluations are usually produced within 5 working days.
- 1.5 The party shall reimburse the MTA for any technical review or support services costs incurred that are associated with his/her request for access to the Metro **TransitRail** System
- 1.6 The following items must be completed before starting any construction:
- A. Each part of the project's design may be reviewed and approved by the MTA. The prime concern of the MTA is to determine the effect of the project on the MTA structure and its transit operations. A few of the other parts of a project to be considered are overhead protection, dust protection, dewatering, and temporary use of public space for construction activities.
 - B. Once the Party has received written acceptance of the design of a given project then the Party must notify MTA prior to the start of construction, in accordance with the terms of acceptance.
- 1.7 Qualified Seismic, Structural and Geotechnical Oversight
- The design documents shall note the name of the responsible Structural Engineer and Geotechnical Engineer, licensed in the State of California.

2.0 REVIEW PROCEDURE

- 2.1 All portions of any proposed design that will have a direct impact on an MTA facility or structure will be reviewed to assure that the MTA facility or structure is not placed in risk at any time, and that the design meets all applicable codes and criteria. Any portion of the proposed design that is to form part of an MTA controlled area shall be designed to meet the MTA Design Criteria and Standards.
- 2.2 Permits, where required by the local jurisdiction, shall be the responsibility of the party. City of L.A. Dept. of Bldg. and Safety and the Bureau of Engineering permit review shall remain in effect. Party shall refer to MTA Third Party Administration policies and procedures, THD5 for additional information.
- 2.3 Monitoring of the temporary support of excavation structures for adjacent construction shall be required in all cases for excavations within the geotechnical zone of influence of MTA structures. The extent of the monitoring will vary from case to case.

- 2.4 Monitoring of the inside of MTA tunnels and structures shall be required when the adjacent excavation will unload or load the MTA structure or tunnel. Monitoring of vertical and horizontal distortions will include use of extensometers, inclinometers, settlement reference points, tiltmeters, groundwater observation wells, tape extensometer anchor points and load cells, as appropriately required. Acceptable limits of movement will depend on groundwater conditions, soil types and also the length of service the stations and tunnels have gone through. Escorts will be required for the survey parties entering the Metro operating system in accordance with MTA Operating Rules and Procedures. An MTA account number will be established and the costs for the escort monitoring and surveying service will be billed directly to the party or his agent as in section 1.2.
- 2.5 The calculations submitted for review shall include the following:
- A. A concise statement of the problem and the purpose of the calculation.
 - B. Input data, applicable criteria, clearly stated assumptions and justifying rationale.
 - C. References to articles, manuals and source material shall be furnished with the calculations.
 - D. Reference to pertinent codes and standards.
 - E. Sufficient sketches or drawing references for the work to be easily understood by an independent reviewer. Diagrams indicating data (such as loads and dimensions) shall be included along with adequate sketches of all details not considered standard by MTA.
 - F. The source or derivation of all equations shall be shown where they are introduced into the calculations.
 - G. Numerical calculations shall clearly indicate type of measurement unit used.
 - H. Identify results and conclusions.
 - I. Calculations shall be neat, orderly, and legible.
- 2.6 When computer programs are used to perform calculations, the following information shall accompany the calculation, including the following:
- A. Program Name.
 - B. Program Abstract.
 - C. Program Purpose and Applications.
 - D. Complete descriptions of assumptions, capabilities and limitations.
 - E. Instructions for preparing problem data.
 - F. Instructions for problem execution.
 - G. List (and explanation) of program acronyms and error messages.
 - H. Description of deficiencies or uncorrected errors.
 - I. Description of output options and interpretations.
 - J. Sample problem(s), illustrating all input and output options and hardware execution statements. Typically, these problems shall be verified problems.
 - K. Computer printout of all supporting calculations.

- L. The "User's Manual" shall also include a certification section. The certification section shall describe the methods and how they cover the permitted options and uses of the program.
- 2.7 Drawings shall be drawn, to scale, showing the location and relationship of proposed adjacent construction to existing MTA structures at various stages of construction along the entire adjacent alignment. The stresses and deflections induced in the existing MTA structures should be provided.
- 2.8 The short-term and long-term effects of the new loading due to the adjacent construction on the MTA structures shall be provided. The soil parameters and other pertinent geotechnical criteria contained in existing contract documents for the affected structure, plus any additional conditions shall be used to analyze the existing MTA structures.
- 2.9 MTA structures shall be analyzed for differential pressure loadings transferred from the adjacent construction site.

3.0 MECHANICAL CRITERIA

- 3.1 Existing services to MTA facilities, including chilled water and condenser water piping, potable and fire water, storm and sanitary sewer, piping, are not to be used, interrupted nor disturbed without written approval of MTA.
- 3.2 Surface openings of ventilation shafts, emergency exits serving MTA underground facilities, and ventilation system openings of surface and elevated facilities are not to be blocked or restricted in any manner. Construction dust shall be prevented from entering MTA facilities.
- 3.3 Hot or foul air, fumes, smoke, steam, etc., from adjacent new or temporary facilities are not to be discharged within 40 feet of existing MTA ventilation system intake shafts, station entrances or portals. Tunnel ventilation shafts are both intake and discharge structures.
- 3.4 Clear access for the fire department to the MTA fire department connections shall be maintained at all times. Construction signs shall be provided to identify the location of MTA fire department connections. No interruption to fire protection water service will be permitted at any time.
- 3.5 Modifications to existing MTA mechanical systems and equipment, including ventilation shafts, required by new connections into the MTA System, shall only be permitted with prior review and approval by MTA. If changes are made to MTA property as built drawings shall be provided reflecting these changes.

At the option of MTA, the adjacent construction party shall be required to perform the field tests necessary to verify the adequacy of the modified system and the equipment performance. This verification shall be performed within an agreed time period jointly determined by MTA and the Party on a case by case basis. Where a modification is approved, the party shall be held responsible to maintain original operating capacity of the equipment and the system impacted by the modification.

4.0 OPERATIONAL REQUIREMENTS

4.1 GENERAL

- A. Normal construction practices must be augmented to insure adequate safety for the general public entering Metro Stations and riding on Metro Trains and Buses. Design of a building, structure, or facility shall take into account the special safety considerations required for the construction of the facility next to or around an operating transit system.
- B. Projects which require working over or adjacent to MTA station entrances shall develop their construction procedures and sequences of work to meet the following minimum requirements:
1. Construction operations shall be planned, scheduled and carried out in a way that will afford the Metro patrons and the general public a clean, safe and orderly access and egress to the station entrance during revenue hours.
 2. Construction activities which involve swinging a crane and suspended loads over pedestrian areas, MTA station entrances and escalators, tracks or Metro bus passenger areas shall not be performed during revenue hours. Specific periods or hours shall be granted on a case-by-case basis, **with the approval of Construction Work Plan by MTA Construction Safety Department.**
 3. All cranes must be stored and secured facing away from energized tracks, when appropriate.
 4. All activity must be coordinated through the MTA Track Allocation process in advance of work activity. **All members of the work crew will be required to attend MTA Safety Training.**
 5. **In order to provide a safe zone to maintain adjacent developments. All developments adjacent to Metro At-Grade Stations, Aerial Stations or Track Guideways shall provide a minimum 5 foot setback from the Metro and developer's shared property line to the outside face of the proposed structure at Metro or the developer's property for maintenance to be performed or installed from within the zone created by this setbacks.**

4.2 OVERHEAD PROTECTION - Station Entrances

- A. Overhead protection from falling objects shall be provided over MTA facilities whenever there is possibility, due to the nature of a construction operation, that an object could fall in or around MTA station entrances, bus stops, elevators, or areas designed for public access to MTA facilities. Erection of the overhead protection for these areas shall be done during MTA non-revenue hours.
1. The design live load for all overhead protection shall be 150 pounds per square foot minimum. The design wind load on the temporary structures shall be 20 pounds per square foot, on the windward and leeward sides of the structure.
 2. The overhead protection shall be constructed of fire rated materials. Materials and equipment shall not be stored on the completed shield. The roof of the

shield shall be constructed and maintained watertight.

- B. Lighting in public areas and around affected MTA facilities shall be provided under the overhead protection to maintain a minimum level of twenty-five (25) footcandles at the escalator treads or at the walking surface. The temporary lighting shall be maintained by the Party.
- C. Wooden construction fencing shall be installed at the boundary of the areas with public access. The fencing shall be at least eight-feet high, and shall meet all applicable code requirements.
- D. An unrestricted public access path shall be provided at the upper landing of the entrance escalator-way in accordance with the following:
 - 1. A vertical clearance between the walking surface and the lowest projection of the shield shall be 8'-0".
 - 2. A clear pedestrian runoff area extending beyond the escalator newel shall be provided, the least dimension of which shall be twenty (20) feet.
 - 3. A fifteen (15) foot wide strip (other than the sidewalk) shall be maintained on the side of the escalator for circulation when the escalator is pointed away from a street corner.
 - 4. A clear path from any MTA emergency exit to the public street shall be maintained at all times.
- E. Temporary sidewalks or pedestrian ways, which will be in use more than 10 days, shall be constructed of four (4") inch thick Portland cement concrete or four (4") inches of asphaltic concrete placed **over a minimum four (4") inches of untreated base material**, and finished by a machine.

4.3 OVERHEAD PROTECTION - Operating Right-of-Way Trackage

- A. MTA Rail Operations Control Center shall be informed of any intent to work above, on, or under the MTA right-of-way. Crews shall be trained and special flagging operations shall be directed by MTA Rail Operations Control Center. The party shall provide competent persons to serve as Flaggers. These Flaggers shall be trained and certified by MTA Rail Operations prior to any work commencing. All costs incurred by MTA shall be paid by the party.
- B. A construction project that will require work over, under or adjacent to the at grade and aerial MTA right-of-way should be aware that the operation of machinery, construction of scaffolding or any operation hazardous to the operation of the MTA facility shall require that the work be done during non-revenue hours and authorized through the MTA Track Allocation process.
- C. MTA flagmen or inspectors from MTA Operations shall observe all augering, pile driving or other work that is judged to be hazardous. Costs associated with the flagman or inspector shall be borne by the Party.

- D. The party shall request access rights or track rights to perform work during non-revenue hours. The request shall be made through the MTA Track Allocation process.-

4.4 OTHER METRO FACILITIES

- A. Access and egress from the public streets to fan shafts, vent shafts and emergency exits must be maintained at all times. The shafts shall be protected from dust and debris. See Exhibit A for details.
- B. Any excavation in the vicinity of MTA power lines feeding the Metro System shall be through hand excavation and only after authorization has been obtained through the MTA Track Allocation process. MTA Rail Operations Control Center shall be informed before any operations commences near the MTA power system.
- C. Flammable liquids shall not to be stored over or within 25 feet horizontally of MTA underground facilities. If installed within 25 to 100 feet horizontally of the structure, protective encasement of the tanks shall be required in accordance with NFPA STD 130. Existing underground tanks located within 100 feet horizontally of MTA facilities and scheduled to be abandoned are to be disposed of in accordance with Appendix C of NFPA STD 130. NFPA STD 130 shall also be applied to the construction of new fuel tanks.

- D. Isolation of MTA Facilities from Blast

Subsurface areas of new adjacent private buildings where the public has access or that cannot be guaranteed as a secure area, such as parking garages and commercial storage and warehousing, will be treated as areas of potential explosion. NFPA 130, Standard for Fixed Guideway Transit Systems, life safety separation criteria will be applied that assumes such spaces contain Class I flammable, or Class II or Class III Combustible liquids. For structural and other considerations, isolation for blast will be treated the same as seismic separation, and the more restrictive shall be applied.

- E. Any proposed facility that is located within 20 feet radius of an existing Metro facility will require a blast and explosion study and recommendations to be conducted by a specialist who is specialized in the area of blast force attenuation. This study must assess the effect that an explosion in the proposed non-Metro facility will have on the adjacent Metro facility and provide recommendations to prevent any catastrophic damage to the existing Metro facility. Metro must approve the qualifications of the proposed specialist prior to commencement of any work on this specialized study.

4.5 SAFETY REGULATIONS

- A. Comply with Cal/OSHA Compressed Air Safety Orders Title 8, Division 1, Chapter 4, Subchapter 3. Comply with California Code of Regulations Title 8, Title 29 Code of Federal Regulations; and/or the Construction Safety and Health Manual (Part F) of the contract whichever is most stringent in regulating the safety conditions to be maintained in the work environment as determined by the Authority. The Party recognizes that government promulgated safety regulations are minimum standards and that additional safeguards may be required

- B. Comply with the requirements of Chemical Hazards Safety and Health Plan, (per 29 CFR 1910.120 entitled, (Hazardous Waste Operations and Emergency Response) with respect to the handling of hazardous or contaminated wastes and mandated specialty raining and health screening.
- C. Party and contractor personnel while within the operating MTA right-of-way shall coordinate all safety rules and procedures with MTA Rail Operations Control Center.
- D. When support functions and electrical power outages are required, the approval MUST be obtained through the MTA Track Allocation procedure. Approval of the support functions and power outages must be obtained in writing prior to shutdown.

5.0 CORROSION

5.1 STRAY CURRENT PROTECTION

- A. Because stray currents may be present in the area of the project, the Party shall investigate the site for stray currents and provide the means for mitigation when warranted.
- B. Installers of facilities that will require a Cathodic Protection (CP) system must coordinate their CP proposals with MTA. Inquiries shall be routed to the Manager, Third Party Administration.
- C. The Party is responsible for damage caused by its contractors to MTA corrosion test facilities in public right-of-way.

End of Section

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.

RECORDING REQUESTED BY
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
Real Estate Department
Deputy Executive Officer - Real Estate
P: 213-922-2415 F: 213-922-2400
One Gateway Plaza, Mail Stop 99-18-4
Los Angeles, CA 90012-2932

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Government Code Section 6103]

Public Agency - No Tax Statement

NOISE EASEMENT DEED

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a
_____,
for themselves, their heirs, administrators, executors,
successors, assigns, tenants, and lessees do hereby grant, bargain, sell, and convey to the
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY, a public
agency existing under the authority of the laws of the State of California ("Grantee"), its
successors and assigns, for the use and benefit of the public and its employees, a perpetual,
assignable easement in that certain real property in the City of Los Angeles, County of Los
Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by
this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property
having the same boundaries as the described Property and extending from the sub-
surface upwards to the limits of the atmosphere of the earth, the right to cause in said
easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic
disturbances, and all other effects that may be caused or may have been caused by
the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit
or action of any purpose, including or not limited to, property damage or personal
injuries, against Grantee, its successors and assigns, for any necessary operating and
maintenance activities and changes related to the Project which may conflict with
Grantors' use of Grantors' property for residential and other purposes, and Grantors
hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or
develop the Property for any permitted use. However, Grantor's rights of development shall
not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, assigns, tenants and lessees of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of _____, 20____

By: _____
Name

By: _____
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of _____)

On _____ before me, _____

Date

Here Insert Name and Title of the Officer

personally appeared _____

Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: _____ Document Date: _____

Number of Pages: _____ Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

Corporate Officer — Title(s): _____

Partner — Limited General

Individual Attorney in Fact

Trustee Guardian or Conservator

Other: _____

Signer Is Representing: _____

Signer's Name: _____

Corporate Officer — Title(s): _____

Partner — Limited General

Individual Attorney in Fact

Trustee Guardian or Conservator

Other: _____

Signer Is Representing: _____



CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Grant Deed from _____, a **California Limited Partnership**, ("Grantor") to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this ____ day of _____, 20__

By: _____
Velma C. Marshall
Deputy Executive Officer - Real Estate

Comment Letter No. 4

Los Angeles County Metropolitan Transportation Authority
Derek Hull, Manager, Transportation Planning
One Gateway Plaza
Los Angeles, CA 90012
January 19, 2018

Response to Comment 4-1

The comment states this letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro). Further, the comment notes that Metro supports the development of transit oriented communities, and that the Project fits within such a community due to its location near the Metro Red Line subway and various Metro bus lines. The comment also provides an accurate description of the Project.

Response to Comment 4-2

The comment states that, since the Project Site is in close proximity to the Metro Red Line subway tunnel, Metro has the following summarized observations related to Red Line Adjacency: the Metro Red Line subway may operate peak service under the Project, construction and operation of the Project must not disrupt line operation, noise mitigation must be borne by the developer and tenants, Metro Rail Engineering Operations must review construction and operation plans prior to permits, Metro staff shall monitor construction, and Metro may request reimbursement for costs incurred by the Project's harm to service or infrastructure. The comment requests that a Noise Easement Deed be recorded in favor of Metro and provides a form for such purpose as an attachment to the comment letter. In addition, a copy of the MTA Design Criteria for Adjacent Construction Design Manual is provided as an attachment to the comment letter.

The Draft EIR acknowledges (page 4.5-4) that the Metro Rail tunnel is located generally along Vermont Avenue near the western boundary of Sites 1 and 2 and the eastern boundary of Site 3. The comment that Metro may operate peak service under the Project is acknowledged. As indicated in the Draft EIR (pages 4.5-7 and 4.5-18) where facilities constructed and operated by Metro are potentially affected by development or infrastructure proposals, the development shall comply with the requirements of Metro's most recent "Design Criteria and Standards", Volume III, Adjacent Construction Design Manual, which are also listed as Regulatory Requirement RR GS-7.

The Project Developer will coordinate directly with Metro in order to comply with any applicable Metro requirements related to noise and vibration associated with the Red Line tunnel and operations and interaction with Project construction and operation. The Project does not include any vibration-sensitive uses. Execution of the Noise Easement Deed attached to Metro's comment letter, as suggested by Metro, would not be required to address an environmental effect of the Project, as it would address an effect of the existing environment (i.e., operation of the Metro Red Line) on the Project. CEQA generally does not require that public agencies analyze the impact existing environmental conditions might have on a project's future users or residents, according to the California Supreme Court's decision in *California Building Industry Association v Bay Area Air Quality Management District*. No adverse effects on Metro Rail operations are anticipated from Project operations nor is it expected that the Project will exacerbate the impacts from the operation of the Metro Red Line. Although execution of a Noise Easement Deed is not required by CEQA or any applicable law, County staff intends to review and consider

the potential terms and conditions of such an easement with Metro, which may be subject to the approval of the County of Los Angeles Board of Supervisors.

As indicated in the Draft EIR (pages 4.5-15 and 4.5-16), the Project would not have an adverse effect on the Metro Rail tunnel or operations of the Red or Purple Metro heavy rail subway lines after complying with Regulatory Requirement RR GS-7.

Response to Comment 4-3

Relating to Bus Stop Adjacency, the comment states that the Metro Lines 204, 754, 18, and 201 operate near the Project Site, and operation of these bus stops needs to be maintained during construction and operation of the Project. Construction of the Project would be primarily confined to the individual Project Sites. As noted in the Draft EIR (page 4.14-56), the Project could require temporary relocation of an existing Metro bus stop on the northeast corner of Vermont Avenue & 6th Street near Sites 1 and 2. The Project Developer would coordinate with Metro to comply with all Metro requirements regarding notification, closures, and changes to bus stops to ensure the temporary impacts are less than significant. The Project would not permanently impact any Metro bus stops after construction as any and all temporary impacts will terminate. In addition, Project driveways would not interfere with Metro bus stops. The closest Project driveway to the existing Metro bus stop on Vermont Avenue would be located north of the existing County office building, on Site 1. This driveway would remain in the same location after construction of the Project on Site 1, approximately 140 feet north of the existing bus stop, and thus would not interfere with the existing bus stop. The agency's suggestions as to potential enhancements for amenities specifically related to transit along public street frontages of the development Sites, including but not limited to, Metro bus shelters with benches, wayfinding signage, enhanced cross-walks, ADA compliance curbs and ramps, pedestrian lighting and a continuous street tree canopy, are unrelated to any Project impacts, and are not in the project description, but will be forwarded to the decision-makers for consideration.

Response to Comment 4-4

The comment addresses Vermont Bus Rapid Transit and states that Metro is planning a Bus Rapid Transit (BRT) Project on Vermont Avenue between Hollywood Boulevard and 120th Street. This project is identified in the Draft EIR (page 4.14-27). However, as noted in the comment, the earliest construction may begin is estimated to be 2024. Operation of designated bus lanes would begin no earlier than 2028, well after completion of the Project (Draft EIR, page 4.14-27). The BRT project would be subject to environmental review under CEQA, which would take the Project into account. The Project would not result in any permanent changes to the Vermont Avenue right of way, nor would it have the potential to affect the potential BRT project.

Response to Comment 4-5

Relating to Transit Orientation, the comment states that Metro supports the development of commercial and residential properties near transit facilities and would like to identify the opportunities associated with transit-oriented development, including Annual Transit Pass and Business Transit Pass programs, transit-oriented, and pedestrian-oriented parking, improved pedestrian and bike access, and pedestrian-orientated street design. As stated in the Draft EIR (Section 4.14 Transportation and Traffic, page 4.14-61), Mitigation Measure MM TR-a1 is a Transportation Demand Management (TDM) Program that promotes non-auto travel and reduced use of single-occupant vehicle trips among office workers on Site 1. Strategies for the Project's TDM program include incentives for using alternative travel modes, such as discounted transit passes for employees, as suggested by Metro (Draft EIR, page 4.14-62).

Metro expresses concern that the Project is providing excessive parking supply. With respect to parking supply provided at the Project Sites, as noted in the Draft EIR (pages 3-26 and 3-32), the Project parking supply was determined based on County needs for employee and visitor parking for Site 1, a combination of City code and Adaptive Reuse Ordinance requirements for Site 2, and a combination of County code and State law (AB 744) requirements for Site 3. The proposed parking supply represents the minimum supply expected to be needed in order to avoid parking overflow into surrounding neighborhoods (Draft EIR, page 5-4).

Additionally, consistent with the comment that the Project should promote first-last mile connections to transit through transit accessible design and pedestrian-oriented street design, the Project would generally improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping to improve pedestrian access to the Project Sites (Draft EIR, pages 4.9-18 and 4.9-19), which would have the secondary effect of promoting pedestrian safety and comfort to access the Metro Rail Red Line station, as suggested by the agency. The Project would also promote bicycle use, as suggested by Metro, by contributing to the City's Bicycle Plan Trust fund, which is the City's mechanism for implementing bicycle improvements (e.g., bike lanes, storage racks, etc.) in the area of the Project (Draft EIR, page 4.14-61), as suggested by the commenter, as well as providing secure long-term and short-term bicycle parking, with 128 long-term and 7 short-term spaces to be provided on Site 1, 260 long-term and 30 short-term spaces on Site 2, and 81 long-term and 21 short-term spaces on Site 3 (Draft EIR, page 3-20), consistent with the agency's suggestion.

Response to Comment 4-6

The comment states the Project applicant should coordinate with Metro Bike Sharing program for a potential Bike Share station at the Project Site, and should facilitate safe connections for pedestrians, bicyclists, and transit users to nearby destinations such as the Wilshire/Vermont Station. As stated in the Draft EIR (page 4.14-61) Mitigation Measure MM TR-a1 is a Transportation Demand Management Program that includes contributing to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area, and Project Design Features. The Project Design Features would create exclusive access points and a friendly convenient environment for bicyclists and pedestrians, and 527 bicycle parking spaces (see also Response to Comment 4-5).

Response to Comment 4-7

Relating to a Congestion Management Program, the comment states that a Transportation Impact Analysis (TIA), with roadway and transit components is required under the State of California Congestion Management Program (CMP) statute. Metro provided a copy of Appendix D, Guidelines for CMP Transportation Impact Analysis as an attachment to the comment letter. As indicated in the Draft EIR (pages 4.14-51 through 4.15-53), a CMP analysis was prepared and the Draft EIR found that because the Project would not significantly impact arterial intersections, mainline arterial segments, or transit systems, no conflict with the Los Angeles County CMP would occur and impacts would be less than significant.

The comment also states Caltrans must be consulted through the NOP process to identify other specific locations to be analyzed. Caltrans was consulted through the NOP process on May 4, 2017 through the State Clearinghouse, and through the NOA process on November 3, 2017. Caltrans submitted a comment letter on the Draft EIR on December 14, 2017, which is included and responded to in this Final EIR (see Comment Letter No. 2).



ERIC GARCETTI
Mayor

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DAVID H. WRIGHT
General Manager

December 18, 2017

Mr. Chris Lopez
County of Los Angeles
Community Development Commission
700 West Main Street
Alhambra, CA 91801

Dear Mr. Lopez:

Subject: Comment Letter Regarding the Notice of Completion and Availability of the Draft Environmental Impact Report (DEIR) for the Vermont Corridor Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to review the DEIR for the Vermont Corridor Project. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the DEIR, LADWP has determined that the project may have impacts to water resources. The following comments reflect our review for matters related to water resources for the project. You may receive additional comments from other divisions at LADWP separately referring to other respective areas.

COMMENTS

1. General (Groundwater):

This project requires temporary dewatering during construction of the underground parking at each site. LA City Ordinance No. 184248, Section 99.05.305.4. states:

“Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer.”

LADWP encourages parties who discharge groundwater to waste to consider applying the water preferably to beneficial uses onsite or, alternatively, discharging groundwater into the sewer, instead of discharging to the storm drain. This helps the City meet conservation and recycled water goals by reducing overall customer demand. Property owners who beneficially reuse can potentially lower their cost of potable water supply and may reduce or eliminate costs associated with storm drain/sewer permitting and monitoring. Common applications of Beneficial Reuse include, Landscape irrigation, Cooling tower make-up, and Construction (dust control, concrete mixing, soil compaction, etc.).



Chris Lopez
Page 2
December 18, 2017

2. Section 4.16 – Utilities and Services Systems (Page 4.16-11):

The top paragraph of Page 4.16-11 states:

“The 2015 Urban Water Management Plan water demand projection for 2040 is approximately 709,500 acre-feet per year, based on normal weather conditions.”

709,500 acre-feet per year is projection for single dry year. Please change to 675,700 acre-feet per year which is projection for average weather year found on page ES-23 of the 2015 Urban Water Management Plan. Please also change accompanying reference footnote to the correct page.

2

3. Section 4.16 – Utilities and Services Systems (Page 4.16-18):

Consider adding “FYE” in front of years 2017 and 2024 on the second paragraph from the top of Page 4.16-18.

3

4. Section 4.16 – Utilities and Services Systems (Page 4.16-24):

Based on the information from this page regarding LADWP’s ability to supply the demands of the project, please consider that the adequacy of water supply is not based on an incremental increase in the Project’s water consumption. Each of the cumulative projects is required to be consistent with the Southern California Association of Governments Regional Transportation Plan projections in order to be accounted for in LADWP’s UWMP current and projected available water demand. Should the related projects be accounted for in LADWP’s UWMP, no significant cumulative water supply impact is anticipated from development of the Project and the cumulative projects.”

4

For any questions regarding the above comments, please contact Mr. Brian Gonzalez of my staff at (213) 367-2612 or at brian.gonzalez@ladwp.com.

Sincerely,



Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:rs
c: Ms. Nadia Parker

Comment Letter No. 5

Los Angeles Department of Water & Power
Charles C. Holloway, Manager of Environmental Planning and Assessment
111 North Hope Street
Los Angeles, CA 90012
December 18, 2017

Response to Comment 5-1

The comment states that the Project requires temporary dewatering during construction of the underground parking structures. Where groundwater is being extracted and discharged a system of onsite reuse shall be developed, or water should be discharged to the sewer. The Draft EIR (pages 4.8-15 and 4.8-16) states that temporary dewatering and discharge of groundwater during excavation operations would be subject to NPDES requirements (Regulatory Requirement HWQ-1, Draft EIR, page 4.8-28). Groundwater extracted during construction would need to be discharged in accordance with existing regulations as no on-site beneficial use is available for the application of this water. As discussed in the Draft EIR (page 4.8-16), compliance with existing regulatory requirements would result in less than significant impacts related to groundwater quality.

Response to Comment 5-2

The comment provides suggested corrections to Section 4.16, Utilities and Service Systems, of the Draft EIR, page 4.16-11. The correction is included in this Final EIR in Section 4.0 Revisions, Clarification, and Corrections on the Draft EIR. The correction relates to the use of the average water year demand of 675,700 acre-feet per year as the projected water demand for 2040 instead of the single dry year demand of 709,500 acre-feet per year. Inclusion of this correction would not change the Draft EIR's determination that impacts related to water supply would be less than significant.

Response to Comment 5-3

The comment provides suggested corrections to Section 4.16, Utilities and Service Systems of the Draft EIR, page 4.16-18. The correction is included in this Final EIR in Section 4.0 Revisions, Clarification, and Corrections on the Draft EIR. The correction clarifies that the per capita potable water use reductions contained in the Mayor's Executive Directive 5 are as of Fiscal Year End ("FYE"). This clarification would not change the Draft EIR's determination that impacts related to water supply would be less than significant.

Response to Comment 5-4

The comment provides suggested corrections to Section 4.16, Utilities and Service Systems of the Draft EIR, page 4.16-24. The correction is included in this Final EIR in Section 4.0 Revisions, Clarifications, and Corrections on the Draft EIR. This correction clarifies that LADWP's methodology for accounting for future growth within its service area is based on consistency with the SCAG Regional Transportation Plan projections and that, if related projects are accounted for in these projections, no significant cumulative water supply impact is anticipated. This clarification would not change the Draft EIR's determination that impacts related to water supply would be less than significant.

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

November 30, 2017

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WWW.LACITYSAN.ORG

Mr. Chris Lopez, Development Specialist, Special Projects
County of Los Angeles
Community Development Commission
700 West Main Street
Alhambra, CA, 91801

Dear Mr. Lopez,

**VERMONT CORRIDOR PROJECT – NOTICE OF COMPLETION AND AVAILABILITY
OF DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF DRAFT EIR
COMMUNITY MEETING**

This is in response to your November 3, 2017 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed mixed-use located at 433, 510, 526, 532, 550 S. Vermont Ave, and 3175 W. 6th St. LA, CA 90020. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

1

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,

Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

CD/AP: mg

c: Kosta Kaporis, LASAN
Abdulsamad Danishwar, LASAN
Christopher DeMonbrun, LASAN

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Comment Letter No. 6

City of Los Angeles, Bureau of Sanitation
Wastewater Engineering Services Division
Ali Poosti, Division Manager
2714 Media Center Drive
Los Angeles, CA 90065
November 30, 2017

Response to Comment 6-1

The comment states LA Sanitation, Wastewater Engineering Services Division has received and logged the Notice of Completion and Availability of the Draft EIR. The comment states there were no changes to the Project and the previous response to the Notice of Preparation, which is contained in Appendix 1-2 to the Draft EIR remains as the only response of this agency. The information provided in this letter was included in Section 4.16, Utilities and Service Systems, of the Draft EIR. This comment does not raise any issues on the content of the Draft EIR.

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

December 14, 2017

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—
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WWW.LACITYSAN.ORG

Mr. Chris Lopez, Development Specialist, Special Projects
County of Los Angeles
Community Development Commission
700 West Main Street
Alhambra, CA, 91801

Dear Mr. Lopez

VERMONT CORRIDOR PROJECT – NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF EXTENSION OF DRAFT EIR REVIEW PERIOD FOR THE PROPOSED VERMONT CORRIDOR PROJECT

This is in response to your November 30, 2017 Notice of Completion and Availability of Final Environmental Impact Report for the proposed mixed-use located at 433, 510, 526, 532, 550 S. Vermont Ave, and 3175 W. 6th St. Los Angeles, CA 90020. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

1

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

Sincerely,

Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation

CD/AP: MG

c: Kosta Kaporis, LASAN
Abdulsamad Danishwar, LASAN
Christopher DeMonbrun, LASAN

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Comment Letter No. 7

City of Los Angeles, Bureau of Sanitation
Wastewater Engineering Services Division
Ali Poosti, Division Manager
2714 Media Center Drive
Los Angeles, CA 90065
December 14, 2017

Response to Comment 7-1

The comment is a largely a duplicate of the prior letter dated November 30, 2017 (Comment Letter No. 6); see the Response to Comment Letter No. 6.

Los Angeles Unified School District

Office of Environmental Health and Safety

MICHELLE KING
Superintendent of Schools

DIANE H. PAPPAS
*Chief Executive Officer
 District Operations and Digital Innovation*

ROBERT LAUGHTON
Director, Environmental Health and Safety

CARLOS A. TORRES
Deputy Director, Environmental Health and Safety

December 22, 2017

Chris Lopez
 Development Specialist, Special Projects
 Community Development Commission, County of Los Angeles
 700 West Main Street
 Alhambra, CA 91801

SUBJECT: PROJECT NAME: Vermont Corridor Project
 PROJECT LOCATION: Site 1: 500, 510, 526, 532 South Vermont Avenue and 523, 531 South Shatto Place;
 Site 2: 540, 542, 550 South Vermont Avenue and 3175 West 6th Street; and
 Site 3: 427, 433 South Vermont Avenue; all within the City of Los Angeles

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the proposed Vermont Corridor Project (proposed project). Site 2 of the proposed project is across the street from Young Oak Kim Academy's northern boundary. Due to the proximity of the proposed project to Young Oak Kim Academy, LAUSD is concerned about the potential negative impacts of the project to our students, staff and parents traveling to and from the Young Oak Kim Academy campus.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on Young Oak Kim Academy related to air quality, noise, traffic, and pedestrian safety will occur. Since the project will have a significant impact on LAUSD schools, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

Air Quality

District students and school staff should be considered sensitive receptors to air pollution impacts. Construction activities for the proposed project would result in short term impacts on ambient air quality in the area resulting from equipment emissions and fugitive dust. To ensure that effective mitigation is applied to reduce construction air pollutant impacts on the Young Oak Kim Academy, we ask that the following language be included as a mitigation measure for air quality impacts:

- If the proposed mitigation measures do not reduce air quality impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related air emissions at the affected Young Oak Kim Academy. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

1

Noise

Noise created by demolition and construction activities may affect the learning environment at Young Oak Kim Academy. These construction activities include grading, earth moving, hauling, and use of heavy equipment. The California Environmental Quality Act requires that such impacts be quantified, and eliminated or reduced to a level of insignificance.

2

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD’s exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level. To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise impacts:

- If the proposed mitigation measures do not reduce noise impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related noise at the affected school. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

Traffic/Transportation

LAUSD’s Transportation Branch **must be contacted** at (213) 580-2900 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the Project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

- School buses must have unrestricted access to schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses’ on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents dropping off their children must have access to the passenger loading areas.

Pedestrian Safety

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.


- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District's School Pedestrian Route Maps are available at: <http://www.lausd-oehs.org/saferoutestoschools.asp>.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractor's are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

4 cont.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending Young Oak Kim Academy, as well as their teachers and the staff. Therefore, the measures set forth in these comments should be included in the Environmental Impact Report to mitigate impacts to the school students and staff.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-3432.

Regards,



Will Meade
Environmental Planning Specialist
LAUSD, Office of Environmental Health and Safety

Comment Letter No. 8

Los Angeles Unified School District
Office of Environmental Health and Safety
Will Meade, Environmental Planning Specialist
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
December 22, 2017

Response to Comment 8-1

The comment states that to ensure that effective mitigation is applied to reduce construction air pollution impacts on Young Oak Kim Academy, LAUSD asks that an additional air quality mitigation measure concerning Young Oak Kim Academy be added to the EIR that would require the development of new mitigation measures in the event that proposed mitigation measures do not reduce air quality impacts to less than significant. The Air Quality analysis provided in the Draft EIR identifies Young Oak Kim Academy as a sensitive receptor (Draft EIR, page 4.2-17 and Figure 4.2-1). The analysis shows that localized construction emissions from Sites 1 and 2, the nearest locations to Young Oak Kim Academy, would not exceed the health-based SCAQMD thresholds of significance (Draft EIR, Tables 4.2-17 and 4.2-18, pages 4.2-35 and 4.2-36). These results reflect implementation of all dust control measures required by SCAQMD (Draft EIR, RR AQ-1, page 4.2-39). Accordingly, the Draft EIR analysis demonstrates that Young Oak Kim Academy would not be adversely affected by Project construction, and the additional mitigation measure suggested by the commenter would not be required. In addition, the Draft EIR provides for the inclusion of cleaner Tier IV off-road construction equipment where readily available (Draft EIR, MM AQ-1, page 4.2-39). Further, the Project's haul route has been designed to avoid passing by any schools. Nonetheless, the Project's mitigation measure requiring notification of construction activities to surrounding uses (MM NOI-6, Draft EIR, page 4.10-35) has been modified to include identification of a point of contact on the Project's construction team who will be available to LAUSD and other nearby uses to address any specific issues that may arise during construction. This clarification would strengthen the existing adequate mitigation measure.

Response to Comment 8-2

The comment states demolition and construction noise may affect Young Oak Kim Academy and requests addition of a noise mitigation measure concerning Young Oak Kim Academy to the EIR. The noise analysis provided in the Draft EIR identified Young Oak Kim Academy as a sensitive receptor (Draft EIR, page 4.10-23 and Figure 4.10-1). The analysis shows that the peak construction noise levels that would be experienced at Young Oak Kim Academy would be 2.2 dBA above ambient levels (Draft EIR, Table 4.10-16, page 4.10-36), which would be below both the Draft EIR threshold of significance (5 dBA, based on the City of Los Angeles standard, Draft EIR, page 4.10-20) and the threshold of significance suggested by the commenter (3 dBA). These results reflect implementation of noise barriers on the southern boundaries of Sites 1 and 2 which would screen the Young Oak Kim Academy from construction noise generated on these two sites (Draft EIR, MM NOI-4, page 4.10-35). Accordingly, the Draft EIR analysis demonstrates that Young Oak Kim Academy would not be adversely affected by Project construction and the additional mitigation measure suggested by the commenter would not be required. Nonetheless, the Project's mitigation measure requiring notification of construction activities to surrounding uses (MM NOI-6, Draft EIR, page 4.10-35) has been modified to include identification of a point of contact on the Project's construction team who will be available to LAUSD and other nearby uses to address any specific issues that may arise during construction. This revision would strengthen the existing adequate mitigation measures.

Response to Comment 8-3

The comment requests notification of the LAUSD Transportation Branch about the start and ending dates for various portions of the Project that may affect traffic within nearby school areas. The commenter requests inclusion of additional language in the mitigation measures for traffic that addresses vehicles associated with school operations. The Draft EIR includes a Regulatory Requirement (RR TR-1, page 4.14-60) that requires preparation of a Construction Management Plan for traffic that addresses safe and efficient movement of vehicles and pedestrians in the vicinity of the Project Sites throughout the period of Project construction. The elements listed in RR TR-1, which include temporary traffic controls, minimizing effects on traffic flows, scheduling of certain activities outside peak traffic periods, and safety precautions for pedestrians and bicyclists, would encompass the items listed in the comment related to the movement of school buses in the area. However, to ensure adequate coordination with respect to school bus travel, RR TR-1 has been modified to require contact with the LAUSD Transportation Branch as part of the development of the Construction Management Plan. Therefore, the specific additional language requested by the agency would not be required as the proposed modification of RR TR-1 adequately addresses the issue. This revision would strengthen the existing adequate mitigation measures.

Response to Comment 8-4

The commenter requests inclusion of additional language in the mitigation measures for pedestrian safety impacts. The Draft EIR includes a Regulatory Requirement (RR TR-1, page 4.14-60) that requires preparation of a Construction Management Plan for traffic that addresses safe and efficient movement of vehicles and pedestrians in the vicinity of the Project Sites throughout the period of Project construction. Safety precautions for pedestrians and bicyclists, including LAUSD students, is a specific element in the Construction Traffic Management Plan. However, to ensure adequate coordination with respect to student pedestrian travel, RR TR-1 has been modified to require contact with the Principal of Young Oak Kim Academy as part of the development of the Construction Management Plan. As such, the specific additional language requested by the commenter would not be required as the proposed modification of RR TR-1 adequately addresses the issue. This revision would strengthen the existing adequate mitigation measures.

2.2 INTERNAL COUNTY DEPARTMENT MEMORANDUM COMMENTS

An internal departmental memorandum was submitted by:

- County of Los Angeles Department of Public Health

Response to the comments contained in this internal departmental memorandum are provided below.



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

JEFFREY D. GUNZENHAUSER, M.D., M.P.H.
Interim Health Officer

CYNTHIA A. HARDING, M.P.H.
Chief Deputy Director

ANGELO J. BELLOMO, REHS, QEP
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12/20/17

TO: Mr. Chris Lopez
Development Specialist
Special Projects
Community Development Commission
Via email: CLopez@labtc.org

FROM: Jeanne Biehler, REHS
Environmental Health Division
Department of Public Health

**SUBJECT: CEQA CONSULTATION
VERMONT CORRIDOR PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
SCH NO. 2017051013**

The Department of Public Health – Environmental Health Division has reviewed the Draft Environmental Impact Report (DEIR) for the subject project, a redevelopment of the area with new office and residential/commercial facilities.

The following comments are offered by the Department’s Toxics Epidemiology Program regarding noise and air quality impacts:

Noise:

- The Lead Agency (LA County) has used Title 12 chap 12.08 and LA City’s municipal code section 112 as the regulatory requirements for noise impacts associated with the project. The subject property lies within the City of Los Angeles; therefore, the City’s municipal’s noise code (chp. XI) applies. We have no objection in applying Title 12 for this project but we recommend that the project ensure adherence to all applicable City noise codes. Any noise complaints from the public will be under the City’s purview for response and enforcement of local codes.

- MM NOI-2: We recommend that the flexible sound curtain be of sufficient height and length with at least a STC of 20 to reach the stated noise reduction. A break in the affected receptor's line of site should be attained. 2
- MM NOI-4: We recommend that the flexible sound curtain be of sufficient height and length with at least a STC of 20 to reach the stated noise reduction. A break in the affected receptor's line of site should be attained. 3
- MM NOI-6: The notification should include contact information for reporting noise complaints or other concerns associated with the project. 4
- The noise mitigation measures MM NOI-1 thru MM NOI-6, should be implemented in the project. The project shall comply with applicable noise regulations. 5
- The construction noise impacts associated with the project are expected to be significant and unavoidable for receptors in the locations indicated in the DEIR. Are there any other or noise mitigation or best management practices that can be included? (I.e. to the extent feasible, hydraulic equipment will be used instead of pneumatic impact tools and electrical powered equipment will be used instead of diesel powered equipment.) 6

Air Quality:

During construction activities, excavation and grading would disturb soils and contribute to fugitive dust emissions. The DEIR includes dust mitigation measures to minimize fugitive dust. It's important to add a discussion from a public health perspective that fugitive dust can result in public exposure to fungal spores such as *Coccidioides immitis*, which can cause Coccidioidomycosis (Valley Fever). The dust mitigation measures would help to minimize the public and workers exposure to the Cocci but a discussion of Valley fever should be included for public awareness.

Valley Fever is the common name (formally known as *Coccidioidomycosis*) for a fungal disease caused by inhalation of *Coccidioides immitis* spores that are carried in dust; it is found in parts of the southwestern United States, Mexico, and South America (LADPH 2016). In California, the highest incidence of Valley Fever occurs in the San Joaquin (Central) Valley, with over 75 percent of reported cases (CDPH 2014). In Los Angeles County or in Southern California, the fungus is endemic. Overall, the Los Angeles County incidence rate for coccidioidomycosis has continued to increase over the last 10 years (refer to **CDPH 2014 attached**) 7

The fungus can become airborne when soil that contains *C. immitis* spores is disturbed, either by natural or anthropogenic (man-made) means, including wind, farming, and construction (excavation & grading). Valley Fever is diagnosed by a blood test, a chest x-ray, and other tests, and it is treatable with antifungal medications. Approximately 60 percent of people exposed to Valley Fever spores develop no symptoms. If symptoms develop, those individuals generally develop a mild respiratory illness with flu-like symptoms that can last a month or more. Rarely, individuals develop a severe illness such as pneumonia, meningitis, or dissemination when the fungus spreads to other parts of the body. At highest risk for exposure to Valley Fever are farmers, **construction workers**, military personnel, archaeologists, and others who are likely to engage in activities that actively **disturb soils** in areas where Valley Fever may be present.

Persons at the highest risk of developing severe Valley Fever include the very young (under 5 years old); older adults (over 60 years old); immunocompromised individuals and those with diabetes; pregnant women; and certain ethnic groups, including African-Americans, Latinos, Native Americans, and Filipinos (LADPH 2016; CDPH 2014). It is believed that contributing factors may include changes in climate and rainfall patterns; **construction activities that disturb soil**; an increase in susceptible persons moving to endemic areas; and heightened awareness and diagnoses (Sondermeyer et al. 2013).

7 cont.

- Building retrofitting and demolition can result in fugitive emissions of hazardous materials such as: asbestos, fiberglass, and lead containing dust. Additionally, activities involving welding can result in fugitive fumes containing metals. Maintain compliance with the SCAQMD rules, OSHA and CDPH for regional and occupational emissions. Apply best available technologies for engineering controls.

8

- Oil and Gas facilities and their components are very common in areas on which construction is to take place. Are there any safety procedures in place for the accidental release of crude oil or other chemicals that are present at these facilities? Is there an inventory of such facilities? Underground oil and gas pipes?

9

- The DEIR should provide information or discussion on the health impacts of ultrafine particles. The decision-making body needs a better understanding of health impacts so that informative decisions can be made. Areas such as the Vermont Corridor neighborhood are already impacted by multiple freeways (I-10, 110 Fwy & US-101) and major arterial roadways (Wilshire Blvd., Vermont Blvd., 6th Street, 3rd Street) going in and out of this area, which include diesel powered vehicles. Traditional filtration associated with ventilation system will not reduce or trap ultrafine particles. The Minimum Efficiency Reporting Value (MERV 17) is the equivalent of a HEPA filtration unit, which could remove up to 95% of UFP and would be the recommended filter for auto emissions reduction (diesel particles) within the indoor environment. However, these filters and the required HVAC units are very costly.

10

- High density housing projects such as the one being proposed for sites 1 and 3 can create additional burden to existing traffic patterns, resulting in constant vehicular emissions during the operational phase of the project sites. Additionally, the potential increase for traffic accidents, exposure to VOCs, PM10 and PM2.5 to people that come daily into the area to their work place can result in negative health outcomes.

11

- The Metro subway station located at the intersection of Wilshire and Vermont, potentially could experience an increase on particle matter deposition due to additional traffic on surrounding roadways, resulting in additional exposures to the public that uses the subway. Has this been discussed?

12

For questions regarding the above section, please contact Robert Vasquez or Evenor Masis at (213) 738-3220 or at rvasquez@ph.lacounty.gov and emasis@ph.lacounty.gov.

For any other questions regarding this report, please feel free to contact me at (626) 430-5382 or at jbiehler@ph.lacounty.gov.



Increased Coccidioidomycosis (“Valley Fever”) in Los Angeles County

Benjamin Schwartz, MD

Dawn Terashita, MD, MPH

July-August 2017



Coccidioidomycosis, commonly known as “Valley Fever,” is an infection caused by inhalation of spores from the fungus *Coccidioides* that lives in dry soil and dust. The number of reported coccidioidomycosis cases have increased in Los Angeles County and in California in the past several years. In 2016, there were 714 reported cases in LA County, compared with 522 in 2015, a 37% increase. Each year since 2009, the number of reported coccidioidomycosis cases has increased annually and the total number of reports has increased 3-fold. While cases are reported from throughout the county, most cases have occurred in northern areas, specifically Antelope Valley and San Fernando Valley. Overall, the rate of coccidioidomycosis in LA County is about 7 cases per 100,000 people; among residents of Antelope Valley the rate is about 9-fold higher than elsewhere in the county. California is also seeing a significant increase in the number of cases reported statewide. The highest rate of infection in the state is in Kern County, immediately to the north of LA County (see map).

Possible reasons for the increase in disease include changes in weather and rainfall as well as persons moving into new developments in areas of higher risk. Changes in surveillance also may be contributing to increased case numbers with more cases being reported through an electronic laboratory reporting system.

Given the increase in risk of coccidioidomycosis, it is important for LA County providers to be familiar with this infection. A summary of coccidioidomycosis transmission, clinical characteristics, diagnosis, management, and prevention is presented below. For more detailed clinical guidance, please see the reference documents at the end of this article.

Transmission

Coccidioidomycosis is typically caused by the inhalation of spores from fungal species belonging to the *Coccidioides* genus from airborne dust or soil (see Biology of Coccidioidomycosis). The risk of infection is greater when the soil is disrupted such as during strong winds, dust storms, building construction, agriculture, earthquakes, and archaeological digs. It is not transmitted person-to-person.



Increased Coccidioidomycosis (“Valley Fever”) in Los Angeles County

Benjamin Schwartz, MD

Dawn Terashita, MD, MPH

July-August 2017



Coccidioidomycosis, commonly known as “Valley Fever,” is an infection caused by inhalation of spores from the fungus *Coccidioides* that lives in dry soil and dust. The number of reported coccidioidomycosis cases have increased in Los Angeles County and in California in the past several years. In 2016, there were 714 reported cases in LA County, compared with 522 in 2015, a 37% increase. Each year since 2009, the number of reported coccidioidomycosis cases has increased annually and the total number of reports has increased 3-fold. While cases are reported from throughout the county, most cases have occurred in northern areas, specifically Antelope Valley and San Fernando Valley. Overall, the rate of coccidioidomycosis in LA County is about 7 cases per 100,000 people; among residents of Antelope Valley the rate is about 9-fold higher than elsewhere in the county. California is also seeing a significant increase in the number of cases reported statewide. The highest rate of infection in the state is in Kern County, immediately to the north of LA County (see map).

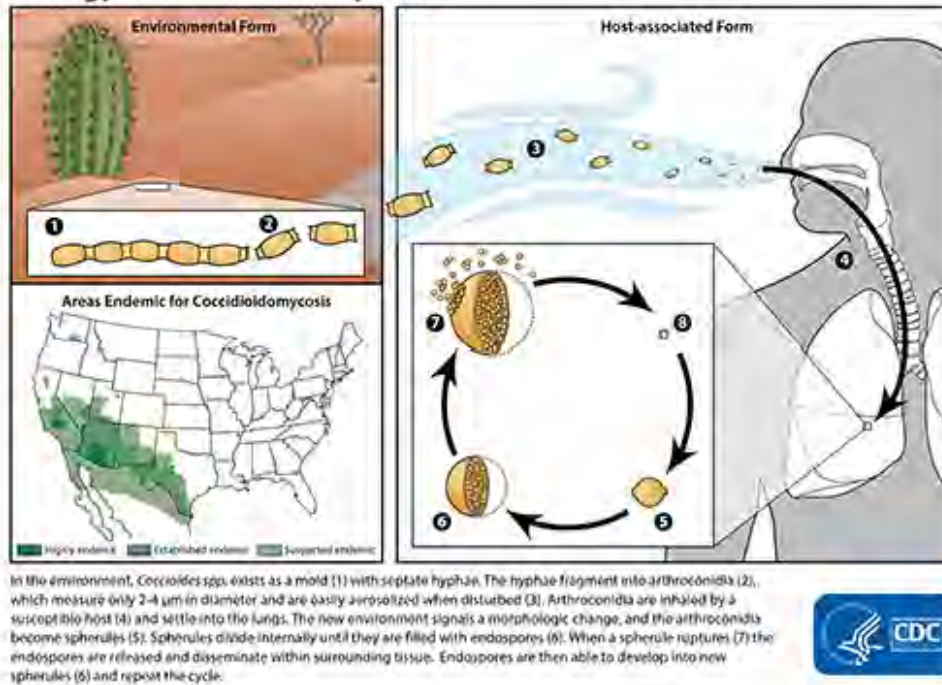
Possible reasons for the increase in disease include changes in weather and rainfall as well as persons moving into new developments in areas of higher risk. Changes in surveillance also may be contributing to increased case numbers with more cases being reported through an electronic laboratory reporting system.

Given the increase in risk of coccidioidomycosis, it is important for LA County providers to be familiar with this infection. A summary of coccidioidomycosis transmission, clinical characteristics, diagnosis, management, and prevention is presented below. For more detailed clinical guidance, please see the reference documents at the end of this article.

Transmission

Coccidioidomycosis is typically caused by the inhalation of spores from fungal species belonging to the *Coccidioides* genus from airborne dust or soil (see Biology of Coccidioidomycosis). The risk of infection is greater when the soil is disrupted such as during strong winds, dust storms, building construction, agriculture, earthquakes, and archaeological digs. It is not transmitted person-to-person.

Biology of Coccidioidomycosis



Source: <https://www.cdc.gov/fungal/diseases/coccidioidomycosis/pdf/coccidioidomycosis-lifecycle508c.pdf>

The fungi are endemic to the southwestern United States (i.e. Arizona, California, Nevada, New Mexico, Texas, and Utah) and parts of Central and South America. Highly endemic areas include the San Joaquin Valley in California and southern Arizona as shown in the maps below.

Areas Endemic for Coccidioidomycosis



This map is based on studies performed in the late 1940s and 1950s and also on locations of more recent outbreaks and cases. *Coccidioides* might also be found in similar areas with hot, dry climates that are not shaded on the map.

Source: <https://www.cdc.gov/fungal/diseases/coccidioidomycosis/causes.html>

Annual Rates of Valley Fever, California 2011-2015



Rates calculated per 100,000 population

Source: http://www.mbc.ca.gov/Publications/Newsletters/newsletter_2017_01.pdf#page=20

Clinical Picture

About 60% of infected people do not develop any symptoms. Among those who are symptomatic, typically beginning one to three weeks after exposure to the spores, a spectrum of symptoms and signs may occur (see box below).

Symptoms and Signs of Primary Coccidioidomycosis

- Fever
- Fatigue
- Night sweats
- Cough
- Chest pain
- Dyspnea
- Hemoptysis
- Headache
- Arthralgia
- Erythema nodosum
- Erythema multiform

Valley fever is the most common presentation and can include a self-limited flu-like illness and/or community acquired pneumonia (CAP) with fever, cough, chest pain, and headache. Systemic complaints — which include fatigue, myalgia, arthralgia, and night sweats — may last for weeks to months. Erythema nodosum and erythema multiforme also may occur. Chest radiograph findings may include diffuse pulmonary infiltrates, hilar adenopathy, and pleural effusion.

Complications are rare but can be severe. Approximately 5-10% of infections result in significant pulmonary disease and less than 1% result in extra-pulmonary disseminated disease that can involve multiple organ systems, last life-long, and lead to outcomes such as meningitis and death. Risk factors for severe or disseminated disease include immunosuppression (e.g. HIV/AIDS, TNF inhibitors, chemotherapy), diabetes mellitus, and pregnancy. In addition, some groups are at higher risk for complications including the elderly, African Americans, and persons of Filipino ethnicity.

Diagnosis

Coccidioidomycosis should be considered in any patient with a compatible clinical syndrome who resides in, works in, or has traveled to an endemic area including Antelope Valley, the north and west parts of the San Fernando Valley, Kern County, Ventura County, California's Central Valley (San Joaquin Valley), and southern Arizona. Providers should note any exposure to airborne dust or soil from the endemic areas. History should also include location and type of work as cases and outbreaks have resulted from work exposures. Prolonged illness or CAP unresponsive to antimicrobial therapy increases the likelihood of coccidioidomycosis. In endemic areas, clinicians should consider testing for coccidioidomycosis in patients who initially present with CAP (especially during seasons when other causes are less common) as an accurate diagnosis may reduce unnecessary exposure to antibiotics and facilitate appropriate counseling and possible therapy.

Serologic tests to detect IgM and IgG antibodies are used most often to diagnose coccidioidomycosis. Although cough associated with coccidioidomycosis generally is non-productive, if sputum can be obtained, direct examination of a smear with potassium hydroxide (KOH) or culture may be positive. The organism also may be identified by culture of tissue.

Treatment

There is currently no evidence that treatment of uncomplicated coccidioidal infections reduces symptom duration or prevents complications; therefore, most immunocompetent patients with mild symptoms will not require antifungal therapy. Supportive care should be provided as needed. Symptoms of prolonged fatigue can be managed by physical therapy for re-conditioning.

the California Department of Public Health.

Antifungal therapy should be started for patients with significantly debilitating illness or who are in groups at higher risk for disseminated disease or adverse outcomes: this includes persons with diabetes mellitus, who are immunocompromised, pregnant women, and the frail elderly. Per the 2016 Infectious Disease Society of America (IDSA) Clinical Practice Guideline for the Treatment of Coccidioidomycosis, treatment may be considered in demographic groups at higher risk for disseminated disease, e.g. African Americans and Filipinos. Generally, treatment is with an oral azole antifungal although in some groups amphotericin B is recommended. As detailed treatment recommendations are beyond the scope of this article, clinicians should refer to the IDSA guideline for more information. In general, primary care providers should consult with specialists if considering initiating treatment.

Prevention



There are no clearly effective interventions to prevent coccidioidomycosis for persons living or working in endemic areas. Approaches to reduce the risk of breathing in the fungal spores include staying inside with windows and doors closed when it is dusty outside, keeping car windows closed and using recirculating air conditioning while driving, and wearing an N95 mask if exposure to a high volume of dust that cannot be avoided.

Patient education materials are available from the Los Angeles County Department of Public Health (DPH). Employers who have staff with work exposures in endemic areas should maintain a comprehensive approach to minimize dust exposure including the use of respiratory protection.

Resources for preventing work-related Valley Fever are available from the Occupational Health Branch at the California Department of Public Health.

Disease Reporting

Providers in California must report coccidioidomycosis within 7 calendar days from identification (Title 17, CCR, Section 2500). For cases in LA County, reports should be submitted:

- by phone - call the Communicable Disease Reporting System at 888-397-3993, or
- by mail or fax - complete a Confidential Morbidity Report (CMR) Form available here <http://www.publichealth.lacounty.gov/acd/reports/CMR-H-794.pdf> and follow fax and mail instructions.

For more information or questions regarding coccidioidomycosis, call the DPH Acute Communicable Disease Control Program at 213-240-7941.

Key Messages

- Between 2015 and 2016, the number of reported coccidioidomycosis cases in Los Angeles County increased 37%. California also saw significantly more cases.
- Clinicians should consider coccidioidomycosis in any patient with a compatible clinical syndrome such as community acquired pneumonia who resides in, works in, or travels to an endemic area including parts of Los Angeles County (Antelope Valley and the west and north parts of the San Fernando Valley).

Additional Resources

- Los Angeles County Department of Public Health
<http://publichealth.lacounty.gov/acd/Diseases/Cocci.htm>
- Valley Fever: Timely Diagnosis, Early Assessment, and Proper Management [30 min webinar; 0.5 CME] <https://www.cdc.gov/fungal/diseases/coccidioidomycosis/health-professionals/cme.html>
- Occupational Health Branch, California Department of Public Health, Preventing Work-Related Valley Fever (Coccidioidomycosis)
<https://www.cdph.ca.gov/Programs/CCDPHP/DEODC/OHB/Pages/Cocci.aspx>
- California Department of Public Health, Coccidioidomycosis (Valley Fever)
<https://archive.cdph.ca.gov/HealthInfo/discond/Pages/Coccidioidomycosis.aspx>

Reference Documents

- 2016 Infectious Diseases Society of America (IDSA), [Clinical Practice Guideline for the Treatment of Coccidioidomycosis](#)
- Valley Fever Center for Excellence, [Valley Fever \(Coccidioidomycosis\) Tutorial for Primary Care Professionals](#)
- Centers for Disease Control and Prevention, [Information for Healthcare Professionals about Valley Fever \(Coccidioidomycosis\)](#)



Also in this issue:

- Preventing Zika (*CME*)
- Increased Coccidioidomycosis
- Preventing Diabetes and Prediabetes
- New Health Brief: Trends in Health Insurance Coverage
- Mumps Outbreak in Adults

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*Rx for Prevention,
2017 July-August;7(2).*

Preventing Work-Related Coccidioidomycosis (Valley Fever)

Valley Fever is an illness that usually affects the lungs. It is caused by the fungus *Coccidioides immitis* that lives in soil in many parts of California. When soil containing the fungus is disturbed by digging, vehicles, or by the wind, the fungal spores get into the air. When people breathe the spores into their lungs, they may get Valley Fever.

Is Valley Fever a serious concern in California? YES!

Often people can be infected and not have any symptoms. In some cases, however, a serious illness can develop which can cause a previously healthy individual to miss work, have long-lasting and disabling health problems, or even result in death.

This fact sheet describes actions employers can take to prevent workers from getting Valley Fever and to respond appropriately if an employee does become ill.



- In October 2007, a construction crew excavated a trench for a new water pipe. Within three weeks, 10 of 12 crew members developed coccidioidomycosis (Valley Fever), an illness with pneumonia and flu-like symptoms. Seven of the 10 had abnormal chest x-rays, four had rashes, and one had an infection that had spread beyond his lungs and affected his skin. Over the next few months, the 10 ill crew members missed at least 1660 hours of work and two workers were on disability for at least five months.

FACT SHEET
HESIS

HAZARD EVALUATION SYSTEM & INFORMATION SERVICE
California Department of Public Health, Occupational Health Branch
850 Marina Bay Parkway, Building P, 3rd Floor, Richmond, CA 94804
510-620-5757 • www.cdph.ca.gov/programs/ohb

How do workers get Valley Fever?

In California, Valley Fever is caused by the fungus *Coccidioides immitis* that lives in the top two to 12 inches of soil in many parts of the state. When soil containing this fungus is disturbed by activities such as digging, vehicles, or by the wind, the fungal spores get into the air. When people breathe the spores into their lungs, they may get Valley Fever. Fungal spores are small particles that can grow and reproduce in the body. The illness is not spread from one person to another.

How do employers know if the fungus is present in soil at their worksites?

The Valley Fever fungal spores are too small to be seen by the naked eye, and there is no reliable way to test the soil for spores before working in a particular place. Some California counties consistently have the Valley Fever fungus present in the soil. In these regions Valley Fever is considered endemic. Health departments track the number of cases of Valley Fever illness that occur. This information is used to map illness rates as seen on the figure above. Employers can contact their local health department for more information about the risk in their counties.

Where do people get Valley Fever?

Highly endemic counties, i.e., those with the highest rates of Valley Fever (more than 20 cases per 100,000 population per year), are Fresno, Kern, Kings, Madera, Merced, San Luis Obispo, and Tulare. Other counties or parts of counties also have the fungus present.



California county-specific coccidioidomycosis incidence rates, 2011

Who is at risk for Valley Fever?

Workers who disturb the soil by digging, operating earth-moving equipment, driving vehicles, or working in dusty, wind-blown areas are more likely to breathe in spores and become infected. Some occupations at higher risk for Valley Fever include:

- Construction workers, including road-building and excavation crews
- Archeologists
- Geologists
- Wildland firefighters
- Military personnel
- Workers in mining, quarrying, gas and oil extraction jobs
- Agricultural workers*

* Cultivated, irrigated soil may be less likely to contain the fungus compared to undisturbed soils.

Anyone, even healthy young people, can get Valley Fever. Once a person has had Valley Fever, their body may develop some immunity against future infections.

How does Valley Fever affect health?

- Experiments on laboratory animals indicate that a very small dose, 10 spores or fewer, may cause an infection.
- After breathing in the spores, the following can happen:
 - In about 60% of cases, symptoms are mild or not present.
 - In about 40% of cases, symptoms vary from moderate to severe. Usually symptoms are those of a flu-like illness that may last up to a month but goes away on its own. However, some people develop pneumonia (at times severe).
 - In a small proportion of cases (about 5%), disease spreads outside of the lungs causing very serious illness. Parts of the body that may be affected include the brain (meningitis), bones, joints, skin, or other organs. This is called **disseminated Valley Fever** (or disseminated coccidioidomycosis).
- People who are more likely to have severe or disseminated Valley Fever include those who have weakened immune systems, such as people who are HIV positive, have AIDS, cancer, or diabetes; who smoke; or who are pregnant. People of African and Filipino descent are much more likely to get disseminated disease; however, others can get disseminated disease, too.



Earth-moving equipment may stir up spores

What are signs or symptoms of Valley Fever?

When present, symptoms usually occur between seven to 21 days after breathing in spores, and can include:

- Cough
- Fever
- Chest pain
- Headache
- Muscle aches
- Rash on upper trunk or extremities
- Joint pain in the knees or ankles
- Fatigue.

Symptoms of Valley Fever can be mistaken for other diseases such as the flu (influenza) and TB (tuberculosis), so it is important for workers to obtain medical care for an accurate diagnosis and possible treatment.

Disseminated Valley Fever

Dissemination refers to spread of infection beyond the lungs to other parts of the body. With Valley Fever this usually occurs within the first six to 12 months after the initial illness.

Signs or symptoms of disseminated Valley Fever may vary but usually consist of some combination of the following:

- Fever
- Raised skin lesions with irregular surfaces
- Lymph node swelling, especially in the neck
- Pain and swelling in one or more joints
- Recurrent, persistent, new headaches (may be mild)
- Stiff neck.

Preventing Valley Fever exposure

There is no vaccine to prevent Valley Fever. Employers can reduce worker exposure by incorporating the following elements into the company's Injury and Illness Prevention Program and project-specific health and safety plans:

1. Determine if the worksite is in an area where Valley Fever is endemic (consistently present). Check with your local health department to determine whether cases have been known to occur in the proximity of your work area. See the map on page 2 to determine whether your company will be working in an endemic county.
2. Train workers and supervisors on the location of Valley Fever endemic areas, how to recognize symptoms of illness (see page 3), and ways to minimize exposure. Encourage workers to report respiratory symptoms that last more than a week to a crew leader, foreman, or supervisor.
3. Limit workers' exposure to outdoor dust in disease-endemic areas. For example, suspend work during heavy wind or dust storms and minimize amount of soil disturbed.
4. When soil will be disturbed by heavy equipment or vehicles, wet the soil before disturbing it and continuously wet it while digging to keep dust levels down.
5. Heavy equipment, trucks, and other vehicles generate heavy dust. Provide vehicles with enclosed, air-conditioned cabs and make sure workers keep the windows closed. Heavy equipment cabs should be equipped with high efficiency particulate air (HEPA) filters. Two-way radios can be used for communication so that the windows can remain closed but allow communication with other workers.
6. Consult the local Air Pollution Control District regarding effective measures to control dust during construction. Measures may include seeding and using soil binders or paving and laying building pads as soon as possible after grading.
7. When digging a trench or fire line or performing other soil-disturbing tasks, position workers upwind when possible.
8. Place overnight camps, especially sleeping quarters and dining halls, away from sources of dust such as roadways.



PAPR with helmet (APF=1000)



Full-face respirator (APF=50)



Half-mask respirator (APF=10)

9. When exposure to dust is unavoidable, provide NIOSH-approved **respiratory protection** with particulate filters rated as N95, N99, N100, P100, or HEPA. Household materials such as washcloths, bandanas, and handkerchiefs do not protect workers from breathing in dust and spores.

Respirators for employees must be used within a Cal/OSHA compliant respiratory protection program that covers all respirator wearers and includes medical clearance to wear a respirator, fit testing, training, and procedures for cleaning and maintaining respirators.

Different classes of respirators provide different levels of protection according to their Assigned Protection Factor (APF) (see table below). Powered air-purifying respirators (PAPRs) have a battery-powered blower that pulls air in through filters to clean it before delivering it to the wearer's

breathing zone. PAPRs will provide a high level of worker protection, with an APF of 25 or 1000 depending on the model. When PAPRs are not available, provide a well-fitted NIOSH-approved full-face or half-mask respirator with particulate filters.

Fit-tested half-mask or filtering facepiece respirators are expected to reduce exposure by 90% (still allowing about 10% face seal leakage), which can result in an unacceptable risk of infection when digging where Valley Fever spores are present.

The table below shows the relative effectiveness of various types of respirators for particles of dust and spores.

Respiratory Protection for Reducing Dust and Spore Exposure		
Respirator Type (worn with particulate filters)	Assigned Protection Factor (APF)	Expected Reduction of Exposure to Dust and Spores (%)
No respirator	None	0
Half-mask respirator (elastomeric or filtering facepiece)	10	90
Powered air-purifying respirator with loose-fitting face covering	25	96
Full-face respirator	50	98
Some powered air-purifying respirators are designed to offer higher protection (check with manufacturer)	1000	99.9

Increasing Protection



Preventing transport of spores

- **Clean tools, equipment, and vehicles with water to remove soil before transporting offsite** so that any spores present won't be re-suspended in air and inhaled at a later time.
- **Provide workers with coveralls or disposable Tyvek™ daily.** At the end of the work day, require workers to remove their work clothes at the worksite.
- **Keep street clothes and work clothes separate by providing separate lockers or other storage areas.** If possible, store work boots at the worksite; otherwise, have workers use a boot wash before getting into their vehicles.
- **Encourage workers to shower and wash their hair at the workplace** (if at a fixed location) or as soon as they get home.

What should employers do if a worker reports Valley Fever symptoms?

- If the worker disturbed soil or otherwise did dusty work in an endemic area, **the employer should send the worker to their workers' compensation health care provider or occupational medicine clinic.** The employer should provide the health care provider with the details about the dust or soil exposure. The worker should give a copy of this fact sheet to the health care provider.
- When two or more workers report symptoms that suggest Valley Fever, workers should be sent to a single medical provider or occupational medicine clinic for coordinated medical care, if possible. This can facilitate better communication between the medical provider, public health agencies, and employer.

- **Travel through endemic areas has resulted in Valley Fever cases.** When a worker who has traveled through an endemic area reports a respiratory illness that lasts more than a week, the employer should send the worker to their workers' compensation health care provider or occupational medicine clinic.
- **Complete the "Employer's Report of Occupational Injury or Illness" (Form 5020) for each occupational Valley Fever illness** which results in "lost time" or medical treatment beyond first aid.
- **List cases on the Cal/OSHA Form 300, "Log of Work-Related Injuries and Illnesses".**
- **Report immediately any serious injury, illness or death occurring in a place of employment** or in connection with any employment to the local Cal/OSHA district office. A "serious injury or illness" is defined in 8 CCR 330(h) found at www.dir.ca.gov/title8/330.html.

What is the treatment for Valley Fever?

Although many people with Valley Fever do not require treatment, those with symptoms should seek medical attention. When Valley Fever is suspected, doctors can order specialized tests to confirm the diagnosis. If treatment is indicated, anti-fungal medications are available. Workers who develop severe or chronic infections may need to stay in the hospital.

It is especially important for people at risk for severe disease, such as people infected with HIV or those with weakened immune systems, to be diagnosed and receive treatment as quickly as possible. People with severe infections need to be treated because advanced Valley Fever can be fatal.

Summary of Controls to Minimize Workers' Dust Exposure and Risk of Valley Fever in Endemic Areas

Type of Control	Actions
<p>Engineering and Work Practice Controls ➤ <i>to control dust at the source or isolate worker from exposure.</i></p>	<p>Minimize exposure to outdoor dust:</p> <ul style="list-style-type: none"> • Suspend (stop) work in dust storms or high winds. • Minimize the amount of digging by hand. Instead, use heavy equipment with operator in an enclosed, air-conditioned, HEPA-filtered cab. <p>Continuously wet the soil before and while digging or moving the earth. Landing zones for helicopters and areas where bulldozers, graders, or skid steers operate are examples where wetting the soil is necessary.</p> <p>When digging in soil is required, train workers to reduce the amount of dust inhaled by staying upwind when possible.</p>
<p>Administrative Controls ➤ <i>to increase hazard awareness and knowledge of safe work practices and select safer work practices.</i></p>	<p>Train workers and supervisors on:</p> <ul style="list-style-type: none"> • Distribution of endemic areas • Symptoms and signs, and need to report to supervisor to obtain medical evaluation • People at highest risk of serious disease • Effective controls, including proper use of equipment.
<p>Personal Protective Equipment ➤ <i>to decrease quantity of fungal spores inhaled.</i></p>	<p>Provide respirators when digging or working near earth-moving trucks or equipment:</p> <ul style="list-style-type: none"> • Powered air-purifying respirator (PAPR) with high efficiency particulate air (HEPA) filter or • Full-face respirator with particulate filter or • Half-mask respirator with particulate filter and • Implement a comprehensive respirator program including medical clearance, training, fit testing, and procedures for cleaning and maintaining respirators. <p>Provide coveralls to prevent street clothes from being contaminated with fungal spores and then taken home.</p>
<p>Clean up ➤ <i>to decrease quantity of fungal spores inhaled.</i></p>	<p>Provide lockers and require change of clothing and shoes at worksite so workers don't take dust and spores home.</p> <p>Wash equipment before moving offsite.</p>
<p>Medical care for disease recognition and prompt, appropriate treatment.</p>	<p>Contract with local medical clinics</p> <ul style="list-style-type: none"> • Provide prompt evaluation and care • Make sure clinic has a protocol for evaluation, follow-up, and treatment of Valley Fever <p>Make sure in-house physician is aware of work in Valley Fever endemic areas.</p>

Valley Fever in the general population in California (includes individuals exposed at work):

- In 2011, 5123 people were diagnosed with new infections.
- The number of new Valley Fever cases reported in California increased dramatically in the past few years. In 2011, there were 20% more cases compared to 2010.
- Every year, about 1,430 people are hospitalized with Valley Fever.
- About 8% (8 out of 100) of people hospitalized with Valley Fever die due to the infection.

RESOURCES

FOR MORE INFORMATION

- **California Department of Public Health, "Coccidioidomycosis (Valley Fever) Fact Sheet"**
www.cdph.ca.gov/healthinfo/discond/pages/coccidioidomycosis.aspx Available in English, Spanish, and Tagalog. Also see *Yearly Summary Report of Coccidioidomycosis in California*.
- **California Department of Public Health, Hazard Evaluation System and Information Service (HESIS).** HESIS answers questions about workplace hazards for California workers, employers, and health care professionals. Call **(510) 620-5817 or (866) 282-5516 (toll free in CA)**. HESIS has many free publications available. To request publications, leave a message at **(510) 620-5717 or toll free (866) 627-1586**, or visit our website at www.cdph.ca.gov/programs/ohb
- **Centers for Disease Control and Prevention, "Coccidioidomycosis, Valley Fever"**
www.cdc.gov/fungal/coccidioidomycosis/.
- **Centers for Disease Control and Prevention, "Increase in Reported Coccidioidomycosis-United States, 1998-2011,"** March 29, 2013 <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6212a1.htm>
- **Injury and Illness Prevention Program.** This standard (California Code of Regulations (CCR) Title 8, Section 3203), requires employers to implement an injury and illness prevention program (IIPP). For links to publications on IIPPs, see www.dir.ca.gov/title8/3203.html.
- **Respiratory Protection.** This standard, CCR Title 8, Section 5144, requires employers to provide respirators when necessary to protect the health of employees. See www.dir.ca.gov/title8/5144.html.

To obtain a copy of this document in an alternate format, please contact: (510) 620-5757. (CA Relay Service: 800-735-2929 or 711). Please allow at least ten (10) working days to coordinate alternate format services.



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JANE NORLING DESIGN

Comment Memorandum No. 9

County of Los Angeles Department of Public Health
Jeanne Biehler, REHS
Environmental Health Division
5050 Commerce Drive
Baldwin Park, CA 91706
December 20, 2017

Response to Comment 9-1

The comment suggests that the Draft EIR used Los Angeles County Code Title 12, Chapter 12.08 as the regulatory requirement for noise impacts associated with the Project, and suggests that the Project should adhere to City noise codes. While the Draft EIR references County Code Section 12.08 as the County's construction noise standard (Draft EIR, page 4.10-19), the thresholds used in the Draft EIR construction noise analysis (Thresholds 4.10-1, 4.10-2 and 4.10-3) are based on the City standards, which are more stringent than the County's standards (Draft EIR, page 4.10-20). Accordingly, the Draft EIR evaluates the Project's construction noise impacts based on the City's standards, as suggested. As determined in the Draft EIR, construction noise impacts are anticipated to be significant and unavoidable after mitigation at four locations (Draft EIR, page 4.10-35), and this unavoidable significant impact will be addressed in the Project's Statement of Overriding Considerations.

Response to Comment 9-2

The comment recommends that Mitigation Measure MM NOI-2 include sound curtains of sufficient height to break the line of sight to an affected receptor, with a Sound Transmission Class rating of at least STC 20, to provide for the 10 dBA reduction required by MM NOI-2. The requested clarification has been included in the Final EIR (see Section 4.0, Revisions, Clarifications and Corrections). This clarification would strengthen an existing adequate mitigation measure.

Response to Comment 9-3

The comment recommends that Mitigation Measure MM NOI-4 include sound curtains of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, to provide for the 10 dBA reduction required by MM NOI-4. The requested clarification has been included in the Final EIR (see Section 4.0, Revisions, Clarifications and Corrections). This clarification would strengthen an existing adequate mitigation measure.

Response to Comment 9-4

The comment suggests that MM NOI-6 should include contact information for reporting noise complaints. The requested clarification has been included in the Final EIR (see Section 4.0, Revisions, Clarifications and Corrections). This clarification would strengthen an existing adequate mitigation measure.

Response to Comment 9-5

The comment suggests that construction noise mitigation measures NOI-1 through NOI-6 should be implemented in the Project and that the Project should comply with all applicable noise regulations. The regulatory requirements and mitigation measures in the Draft EIR would be implemented and are contained in the Mitigation Monitoring and Reporting Program for the Project (Final EIR, Section 3.0, Mitigation Monitoring and Reporting Program), which will be recommended to be adopted by the Board of Supervisors in the event that the Project is approved.

Response to Comment 9-6

The comment inquires as to whether any additional mitigation measures are available to address the significant and unavoidable construction noise impacts of the Project. The Noise section of the Draft EIR identifies all feasible mitigation measures to address construction noise impacts, but Mitigation Measure MM AQ-1 (Draft EIR, page 4.2-39) also provides for the inclusion of electrically powered equipment, which would reduce the noise levels generated by the equipment, in Project construction activities, where feasible, in order to reduce emissions from the operation of diesel powered equipment. However, the inclusion of this air quality mitigation measure will not reduce the construction noise impacts to less than significant. These impacts would remain significant and unavoidable after all feasible mitigation measures have been implemented; there are no additional feasible construction noise mitigation measures. This unavoidable significant impact will be addressed in the Project's Statement of Overriding Considerations.

Response to Comment 9-7

The comment confirms the importance of implementing the recommended mitigation measures to address fugitive dust emissions from the Project and requests the addition of a discussion of Valley Fever in the interest of "public awareness". As described in the comment, fugitive dust can result in exposure to fungal spores that can cause Valley Fever. Valley Fever is a typically treatable non-person to person contagious illness that usually affects the lungs and is caused by a fungus found in the soil in many parts of California and elsewhere in the southwestern United States and parts of Central and South America.

The reported number of cases has increased in Los Angeles County and California since 2009, and most cases in Los Angeles County have occurred in the Antelope Valley and San Fernando Valley. The commenter attaches an article entitled "Increased Coccidioidomycosis ("Valley Fever") in Los Angeles County", July-August 2017, showing the distribution of cases and documenting that overall the Los Angeles County rate is about 7 cases per 100,000 people. Authors Drs. Schwartz and Terashita are from the County's Department of Public Health and have contributed to awareness of this disease for both clinicians and the public.

The control of Valley Fever spores inhalation and infection is a benefit of the regulatory requirements and mitigation measures proposed to address fugitive dust from construction-related soil disturbance in California, as are the other benefits of dust mitigation like the reduction of respiratory conditions such as asthma. Construction workers, agricultural workers, and others who disturb the soil are the most at risk for potential infection. Project Regulatory Requirement RR AQ-1, Draft EIR page 4.2-39 addresses compliance with the SCAQMD Rule 403 regarding fugitive dust.

The comment attaches an additional document to assist in educating the public on the dust borne fungus that can cause Valley Fever (see attachments to the memorandum). This update advances public awareness and supports appropriate diagnosis and treatment.

Response to Comment 9-8

The comment suggests that building retrofitting and demolition can result in fugitive emissions of materials such as asbestos, fiberglass and lead containing materials. The comment suggests that the Project comply with SCAQMD, OSHA and COPH regulations to control regional and operational emissions. As discussed in the Draft EIR (page 4.7-30), handling of asbestos, lead-based paint and lead containing materials during Project construction would be in accordance with existing mandatory regulatory requirements (Regulatory Requirements RR HH-2 and RR HH-3). Fiberglass, which is not toxic, would be handled by construction personnel in accordance with Cal-OSHA requirements.

Response to Comment 9-9

The comment inquires as to the potential to encounter oil and gas facilities and pipelines on the Project Sites. As discussed in the Draft EIR (pages 4.7-13 and 4.7-17), all three Project Sites are located within the boundaries of the Los Angeles City Oil/Gas Field. Based on information from the State Division of Oil, Gas and Geothermal Resources (DOGGR), and reported in the Phase I reports (Draft EIR, Appendices 4.7-1 and 4.7-2), oil wells were previously located on Sites 1 and 2, and the Draft EIR concludes that impacts from previous oil wells could be potentially significant (Draft EIR, page 4.7-13). In boring number B2 taken under the Phase II Environmental Site Assessment (ESA), elevated petroleum hydrocarbon concentrations in the carbon range of diesel range organics and oil range organics were above the screening thresholds. The source of this petroleum-impacted fill material is unknown. This petroleum-impacted fill material, was well below the planned office building finish floor elevation (FFE) of approximately 248 feet above mean sea level. Therefore, it is unlikely that this zone of petroleum-impacted fill material would be encountered during building construction, except possibly in small quantities during pile installation as a part of foundation preparation for the planned office building. To further evaluate the potential oil wells in the western portion of Site 1, an initial review of the oil wells located on or adjacent to the Project was conducted (Draft EIR, Appendix 4.7-8). This evaluation concluded that the previous wells were likely hand dug in the late 19th century and no casing was used in the completion of the wells. Accordingly, the anomaly identified in the geophysical survey in the northern parking lot is most likely something other than an oil well. In addition, the fact that two separate methane investigations have yielded non-detect levels of methane support the contention that hydrocarbons are not seeping from the previous wells. Given the above, it is unlikely that the DOGGR will require abandonment of the oil wells present at the Site. The Draft EIR (Mitigation Measure MM HH-2, page 4.7-31) indicates that the Project's excavation plans will be submitted and reviewed by DOGGR prior to construction and that the Project will follow the recommendations of DOGGR regarding possible re-abandonment of wells, and other regulatory requirements that would assure that construction activities can be safely undertaken with respect to encountering potential oil wells and related hazards, and impacts would be less than significant (Draft EIR, page 4.7-31). See also Response to Comment 3-4.

Response to Comment 9-10

The comment suggests that the Draft EIR should evaluate the potential effects of ultrafine particles. As discussed in the Draft EIR (pages 4.2-27 through 4.2-36), regional and localized emissions of particulate matter, both PM₁₀ and PM_{2.5}, that would result from Project construction and operations would be below SCAQMD thresholds and therefore would be less than significant. The primary source of ultrafine fine particles in urban areas is the combustion exhaust from diesel-fueled vehicles. The California Air Resources Board (CARB) is responsible for the coordination of federal and state air pollution control programs in California. In its Air Quality and Land Use Handbook, CARB states "air pollution studies indicate that living close to high traffic and associated emissions may lead to adverse health effects beyond those associated with regional air pollution in urban areas". The Air Quality and Land Use Handbook cites several studies linking adverse respiratory health effects to proximity to roadways with heavy traffic densities, where the distances between the roadway and the receptors were 300 to 1,000 feet, with effects falling off substantially beyond these distances. Specifically, with respect to land uses located near freeways, CARB recommends against siting new sensitive land uses within 500 feet of a freeway. The freeway nearest to the Project Sites is the Hollywood Freeway (US-101), which is approximately 0.9 miles away. The Draft EIR does not directly evaluate the effects of ultrafine particles generated from trucks and other diesel-fueled vehicles on Project employees and residents because these receptors are too far away from the source to receive any substantial exposure. Because of the distance

between the source and the Project, no impact would occur and incorporation of high efficiency (i.e., MERV 17) filtration systems as suggested by the commenter would not be required.

Response to Comment 9-11

The comment suggests that high density housing projects can create additional traffic burdens that can increase traffic accidents, and increase exposure to air pollution that can result in negative health outcomes. As discussed in the Draft EIR (pages 4.14-53 and 4.14-54), vehicular access to the Project would be provided by a series of driveways that would provide safe access in and out of the Project Sites. Access to Site 1 was designed to help accommodate the goals of the City's Vision Zero program, a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. In addition, Site 1 is not a high density housing project; rather it is an office building. Vermont Avenue is part of the High Injury Network (HIN), and it is preferable to limit access on HIN streets. Therefore, the egress driveway onto Vermont Avenue is limited to right-turns only rather than allowing unsafe left turns across a turn pocket. Additionally, Project design emphasizes the use of Shatto Place (which is not a HIN street) as the primary access point to Site 1. As such, Site 1 driveways have been designed to avoid potential injuries related to unsafe intersections. Access to Site 2 was also designed to help accommodate the goals of the City's Vision Zero program. No access to Site 2 would be provided on Vermont Avenue. Access to Site 2 would be provided from 6th Street, which has fewer lanes, lower traffic volumes, and lower travel speeds than Vermont Avenue. Vehicular access to Site 3 would be provided via a single full-access driveway on Vermont Avenue providing access to subterranean parking in the same location as the existing driveway. Driveway locations and design would be approved by the City to implement the goals of the Vision Zero Program. As such, Project driveways have been designed with safety in mind and the Draft EIR properly concludes that impacts associated with Project access would be less than significant (Draft EIR, page 4.14-54). With respect to air pollution, as discussed in the Draft EIR (pages 4.2-30 through 4.2-32), regional operational emissions of all criteria pollutants that would be associated with the Project, which primarily result from auto traffic generated by the Project, would be below SCAQMD thresholds and therefore less than significant.

Response to Comment 9-12

The comment suggests that the Wilshire/Vermont Metro Rail station could experience an increase in particle matter deposition due to additional traffic on surrounding roadways, resulting in additional exposures to the public that uses the subway. As discussed in the Draft EIR (pages 4.2-27 through 4.2-36), regional and localized emissions of particulate matter, both PM₁₀ and PM_{2.5}, that would result from Project construction and operations would be below SCAQMD thresholds and therefore would be less than significant.

2.3 ORGANIZATIONS AND INDIVIDUALS

Comment letters from community organizations and individuals include:

- KoreaTown Arts & Recreation Center Coalition (K-ARC)
- Lozeau Drury, LLP, on behalf of Labors International Union of North America, Local Union No. 300
- Jerrey Ojeah

Responses to the comments in these letters are provided below, after each letter.

KOREATOWN ARTS & RECREATION CENTER COALITION

c/o Caroline Sim
847 ½ N. Rampart Blvd.
Los Angeles, CA 90026
Cell: 213.447.5475
emailmenowlater@gmail.com

January 19, 2018

Chris Lopez
Development Specialist, Special Projects
Community Development Commission, County of Los Angeles
700 West Main St., Alhambra, CA 91801
Sent via email christopher.lopez@lacdc.org

Re: Comments on Vermont Corridor Project Draft Environmental Impact Report
State Clearinghouse No. 2017051013

Dear Mr. Lopez:

The Koreatown Arts & Recreation Center Coalition (K-ARC) is a collaboration of individuals and community organizations advocating for a community center as well as sustainable, equitable development within Koreatown. K-ARC submits the following comments regarding the Draft Environmental Impact Report (EIR) for the Vermont Corridor Project (Project):

Population and Housing Impacts

K-ARC requests that the EIR analyze impacts relating to the displacement of existing residents, businesses and workers in the Project vicinity. Specifically, K-ARC requests that portions of the Project on Site 1 and Site 2 contribute to the City's Affordable Housing Trust Fund.

The Vermont Corridor Project sites and the immediate neighborhood are situated within Koreatown, a recognized multiracial, immigrant community that has historically been a gateway for immigrants to raise families and live in the neighborhood for many decades. The neighborhood is comprised of majority Latino (58%) and Korean (22%) foreign-born residents—disproportionately employed in low-wage occupations with a median household income of \$36,000—who have built this area into the rich cultural nexus Koreatown has become well-known for. The Vermont Corridor Project capitalizes on Koreatown's historic and cultural identity and threatens its cultural fabric by building 172 market-rate, luxury units and 13,400 square feet of retail and restaurant space that cater to high-income households that do not reflect the vast majority of Koreatown's population. This project invites new residents and visitors to the

neighborhood who have little to no cultural understanding or sensitivities towards the community and promote high displacement of Koreatown's existing population including residents, businesses, and workers. The Project's contribution to the ongoing crisis of displacement results in environmental impacts that are not accounted for in the EIR.

The City of Los Angeles recently adopted the Affordable Housing Linkage Fee Ordinance (Ordinance 185,342) which requires payment of a fee for new development projects. The nexus study, prepared by BAE Urban Economics, and the preamble to the Ordinance explicitly conclude there is a reasonably direct connection between the development of new market-rate housing and non-residential development, and the need for affordable housing in the vicinity of the development. The proposed senior affordable units comprise less than 10% of the total units and a small fraction of the total Floor Area, thus generating substantial new need for affordable housing.

The EIR's Population and Housing analysis fails to consider that the Project's very low-, low- and moderate-income employees will be unable to find housing in the Project vicinity. This has cascading consequences on several impact areas. In addition, prospective tenants and employees of the offices will need to commute further to jobs within Koreatown, exacerbating the Project's significant traffic and air quality impacts and further degrading the quality of transit service in the area. The BAE Urban Economics report constitutes substantial evidence of a potentially significant housing and population impact. To mitigate that impact, the Project should provide full 100% contributions to the Affordable Housing Trust Fund.

1 cont.

Recreation Impacts

K-ARC requests (i) that the EIR properly describe the Project's environmental setting by fully disclosing the severe park deficiency in Koreatown, (ii) that the EIR properly disclose a potentially significant recreation impact, and (iii) that the EIR consider mitigation measures requiring publicly accessible open space at the roof levels of Site 1 and/or Site 2.

Misleading Environmental Setting

The City and County both recognize that Koreatown is objectively the most park-poor urban community in their jurisdictions. The County's Park Needs Assessment of 2015 and 2016 concluded that Koreatown is the most park-poor urban community in the County with 42,611 people per square mile and 0.001 acres of park space per 1,000 residents compared to the Citywide average of 9 acres per 1,000 residents. Based on a City of Los Angeles Department of Recreation and Parks Board Report for a nearby project, 93% of all residents in Koreatown were considered "non-served" by park and recreation facilities.¹ The EIR attempts to minimize the additional impacts of the Project by simply describing the area as "underserved" and listing parks located up to ten miles away from the Project site – as if the Rancho Park Golf Course actually serves the Koreatown community. Ignoring the City's General Plan and the Mayor's Sustainability pLAN, the EIR fails to acknowledge that parks in dense urban areas should be

2

¹ Board of Recreation and Parks Commissioners Board Report regarding a Vesting Tentative Tract Map at 500 S. Oxford dated August 9th, 2017.

within walking distance to adequately serve the population. The EIR fails to properly describe the environmental setting of the Project, misleading the public and establishing a faulty foundation for its analysis.

2 cont.

Undisclosed Significant Impact

The EIR itself concludes the Project's three sites generate a need for **1.24 additional acres** of open space to comply with General Plan standards. CEQA Guidelines Threshold 4.13-2 provides:

Threshold 4.13-2: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Despite explicitly acknowledging the Project generates a need for 1.24 additional acres of open space, the EIR concludes:

With the payment of Park Fees to the City, new or expanded City park development would offset demand from the proposed uses on Site 2, and impacts to parks and recreational facilities would be less than significant.

3

The connection between payment of park impact fees and improved park facilities in the Project area is tenuous at best. In Koreatown, the Project's park fees could not conceivably purchase and improve 1.24 acres of parkland. After subtracting the 13,200 square-foot community center on Site 3, the Project results in an unmet demand for 40,814 square feet of park space. Based on Threshold 4.13-2 and the analysis in the EIR itself, the Project would require new or expanded recreational facilities.² Moreover, the City's Parks Dedication and Fee Update Ordinance expanded the radius in which fees may be used, further uncoupling the connection between payment of park fees and mitigation of park impacts. Regulatory Requirement RR-REC-2 regarding payment of park fees does not result in Project impacts being less than significant.

Mitigation Measures

K-ARC requests the EIR consider the feasibility of the following mitigation measures: (i) funding programming and free admittance/memberships for low income residents to the community space on Site 3 and (ii) publicly-accessible open space at the rooftop levels of Site 1 and/or Site 2. Mitigation measures must be imposed to reduce the Project's open space impacts to less than significant levels.

4

Traffic Impacts

K-ARC requests the EIR require a more robust Transportation Demand Management (TDM) program to properly mitigate traffic impacts, including the measures enumerated below.

5

² Alternatively, the EIR would need to disclose a significant Land Use impacts because the Project would conflict with numerical open space standards in the General Plan.

CEQA's substantive mandate requires that the Project adopt all feasible mitigation measures to reduce the significant traffic impacts at ten intersections. The EIR's TDM program (MM TR-a1) falls far short of this mandate.

First, the TDM mitigation applies only to the office workers on Site 1.³ It is feasible to apply the measures to the entire Project, including retail and residential uses. Specifically:

- Parking should be unbundled on Site 2.
- Discounted monthly transit passes should be provided for retail employees and residents throughout the Project.
- Car-share information should be posted and distributed to all residents and employees, even if the car-share is located on Site 1.

Second, the EIR presumes that CEQA's substantive mandate is satisfied by complying with an arbitrary 10% trip reduction goal. In fact, CEQA requires that all feasible mitigation measures be adopted; the Statement of Overriding Considerations cannot justify a failure to adopt feasible mitigation measures. The following mitigation measures are feasible and should be mandatory elements of the TDM program:

- Discounted monthly Metro passes shall be provided for all employees and residents.
- Provide and promote ride-share matching services, in conjunction with a "guaranteed ride home" program for all office employees.
- Provide on-site car-share facilities, including publicly visible signage.
- Provide unbundled parking that separates the cost of obtaining assigned parking spaces from the cost of purchasing or renting residential units.
- Accommodate flexible/alternative work schedules such as "9/80".
- Ensure there are no net new parking spaces above the existing 1,122 spaces.
- Use the approximately \$50 million saved (by not building an additional 1,000 parking spaces) for affordable housing for car-free County employees and recreational amenities. This could result in substantial savings to the County and an increase in employee productivity.
- Ensure that the County's Transportation Program Manager is authorized to provide education, training and surveying of employees on detailed TDM options, including parking cash-out, and under what conditions employees would stop driving to work.

5 cont.

Thank you for your consideration of these comments. Please feel free to contact us via Caroline Sim if you have any questions or concerns.

Sincerely,

Koreatown Arts & Recreation Center Coalition

³ The LADOT assessment dated June 29, 2017 does not indicate the mitigation measures are intended to apply only to office uses.

Comment Letter No. 10

KoreaTown Arts & Recreation Center Coalition
 c/o Caroline Sim
 847 ½ North Rampart Boulevard
 Los Angeles, CA 90026
 January 19, 2018

Response to Comment 10-1

The comment requests that the EIR analyze impacts relating to the displacement of existing residents, businesses and workers in the Project vicinity, and requests that the Project on Sites 1 and 2 contribute to the City's Affordable Housing Trust Fund. As discussed in the Draft EIR (page 6.5-9), the Project would not directly displace any housing or residents, nor would it displace any businesses, as the Project Sites are presently occupied by County office buildings and parking facilities; no residences or commercial businesses are present on any of the three Project Sites. With respect to potential indirect effects of the Project on displacement of residents and business, the commenter's contention that the Project's inclusion of market rate housing on Site 2 would result in displacement is not supported by substantial evidence. The BAE (sic) Urban Economics study referenced by the commenter identifies a nexus between new commercial and residential development and the need for new affordable housing, it does not evaluate any effects of such development on the existing supply of affordable housing.¹ Any connection between the construction of market rate housing units and the displacement of existing residents is speculative and also fails to take into account the Project as a whole, as Site 3 is an affordable housing project. Further, pursuant to CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as significant effects on the environment, unless a cause and effect relationship can be established that an economic and social effect would result in an adverse physical effect on the environment. Since no direct displacement would occur and any expectation of indirect displacement resulting from the Project would be speculative, as discussed above, the commenter has not provided any evidence that this speculative economic or social impact would result in an adverse physical effect on the environment. Since such a relationship cannot be established, CEQA clearly states that such potential effects shall not be treated as significant.

The commenter contends that the Project's affordable units on Site 3 would comprise less than 10% of the total units provided. In fact, the 72 senior affordable units that would be provided on Site 3 would comprise 22.6% of the total units included in the Project. As discussed in the Draft EIR (page 3-23), additional housing would be provided on Site 2. This housing would consist of market-rate units provided through the adaptive reuse of the existing DMH office building, and construction of a new residential building on the site of the existing WDACS office building. Street level commercial uses would also be provided within both buildings. Proposed new commercial development and market-rate housing within the existing DMH building on Site 2 would be subject to City requirements, including the Affordable Housing Linkage Fee Ordinance. In addition, residential units within the new residential building and new

¹ *bae urban economics, "Los Angeles Affordable Housing Linkage Fee Nexus Study", September 21, 2016. "The commercial fee analysis conducted for this report is based on the premise that new commercial land uses generate new employment for workers that will have a range of household incomes....The commercial fee would ... (generate) revenue to support the construction of housing affordable to the new lower-income worker households." (p.8). "Residential fees for affordable housing apply to market rate units, and are based on the "nexus" or relationship between the occupants of a market-rate unit's spending in the economy, and the portion of this spending that generates workers' low income households needing affordable units." (p.41).*

commercial development on the WDACS office building site would be subject to City affordable housing requirements that are in effect at the time approvals are requested from the City (see also Response to Comment H-8).

The commenter's contention that Project employees would not be able to find housing in the Project Site vicinity and therefore result in increased traffic and air quality impacts is speculative. As discussed in the Draft EIR (pages 3-18 through 3-20, 3-23, and 3-26), the vast majority of employees in the Project would be existing County employees that are already employed on the Project Sites, or would be relocated from nearby facilities in the Vermont Corridor. The commuting patterns of these employees would be expected to be similar to existing patterns as the employment location largely remains the same. Traffic generation and distribution for the Project was based on previous study findings that identified existing travel patterns of current DMH employees in the Vermont corridor, industry-standard trip generation rates, and regional trip distribution patterns (Draft EIR, page 4.14-26), which provide for a wide distribution of traffic throughout the area of the Project Sites. The Project air quality analysis is based on the assumptions of the traffic study (Draft EIR, page 4.2-20), which as noted above is largely based on existing employment patterns, and also reflects trip lengths based on regional averages. As such, the air quality analysis doesn't assume that employees would require nearby housing. These analyses assume an appropriate regional distribution of Project employees, and their findings are not dependent on whether Project employees are able to find housing in the immediate area of the Project Sites. Moreover, as noted above, the Project on Site 2 would provide Affordable Housing Linkage Fees to the City to promote construction of new affordable housing in the area. These comments will be forwarded to the decision-makers for consideration.

Response to Comment 10-2

The comment suggests that the Draft EIR does not adequately describe the park deficiency in Koreatown. The Draft EIR notes (page 4.13-1) that the Wilshire Community Plan area provides only 0.23 acres of open space and recreation per 1,000 people. The park facilities listed in the Draft EIR (pages 4.13-1 through 4.13-4) were provided by the City of Los Angeles Department of Recreation and Parks, the service provider for the area (Appendix 4.12-1 to the Draft EIR). The Draft EIR further notes that, according to the Department of Recreation and Parks, the Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage (Draft EIR, page 4.13-4). Since the area is fully developed with no available space for parks, the Project would provide Park Fees. In addition to Park Fees, the Project would provide on-site open space meeting the City's requirements (Regulatory Requirement RR REC-1, page 4.13-11) and on-site recreational amenities that would reduce Project residents' demand on City facilities. Therefore, the Draft EIR appropriately concludes that the Project's impacts on park and recreation facilities would be less than significant.

Response to Comment 10-3

The comment suggests that the Draft EIR does not properly disclose a potentially significant park impact. The Draft EIR (page 4.13-9) identifies that the Project would increase demand for park and recreation facilities in an underserved area, and that the Project would pay Park Fees (Regulatory Requirement RR REC-2, page 4.13-12), which is the City's mechanism for raising revenue to develop park facilities to serve the City's residents and an acceptable method to reduce impacts related to park facilities to less than significant. Provision of these facilities is beyond the responsibility of either the County or the Project Developer, and is the responsibility of the City's Department of Recreation and Parks. In addition to Park Fees, the Project would provide on-site open space meeting the City's requirements (Regulatory Requirement RR REC-1, page 4.13-11) and on-site recreational amenities that would reduce Project residents' demand on City facilities. The Draft EIR appropriately concludes that the Project's impacts on

park and recreation facilities would be less than significant. No undisclosed significant impact would occur.

Response to Comment 10-4

The comment suggests that the EIR should consider additional measures such as funding programming and free memberships to the community recreation center for low income residents, and publicly accessible open space at the roof levels on Site 1 and Site 2. The suggestions would actually serve to address existing public facilities deficiencies, not impacts that would be created by the Project (see Response to Comment 10-2). As noted in Response to Comment 10-3, impacts of the Project with respect to recreation would be less than significant with compliance with existing regulatory requirements. Nonetheless, the community recreation center on Site 3 would be operated by a non-profit service provider. These organizations typically offer free or reduced fee memberships to low income community members which would serve to address the variety of economic income statuses served, particularly by Site 3.

Response to Comment 10-5

The comment suggests that the EIR should require a more robust Transportation Demand Management (TDM) Program to mitigate traffic impacts. The comment suggests that, in addition to the office use on Site 1, TDM measures should also be applied to retail and residential uses on Site 2 and suggests several specific measures to be included in such a program. The comment also suggests that the Draft EIR limits the effects of the TDM program to an arbitrary 10% trip reduction goal and suggests additional mitigation measures for the TDM program on Site 1. As discussed in the Draft EIR (Mitigation Measure MM TR-a1, pages 4.14-61 and 4.14-62), the Project is required to develop a TDM program that meets a minimum trip reduction goal of 10%. Strategies for the Project's TDM program include incentives for using alternative travel modes, such as discounted transit passes for employees and "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site, provision of transit information, and design provisions to facilitate bicycle use and walking (Draft EIR, page 4.14-62). However, this list is not necessarily exhaustive. The Project's TDM program would be expected to incorporate all feasible trip reduction measures in order to achieve the maximum trip reductions from the Project. The 10% figure represents the maximum that LADOT will allow in its analysis methodology as an offset to Project-generated traffic. It is not necessarily reflective of the actual trip reduction that would be achieved by the Project's TDM program. See also Response to Comment H-12 below. As shown in the Draft EIR (pages 4.14-31 and 4.14-40 and 4.14-41), the major traffic generator is the office project on Site 1; neither the residential mixed use project on Site 2 or the affordable housing project on Site 3 generate substantial trips in comparison to the Site 1 use. As such, the TDM program appropriately focuses on Site 1's office use. This comment will be forwarded to the decision-makers for consideration.



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richard@lozeaudrury.com

Comment Letter No. 11

Via Email and Mail

December 19, 2017

Mr. Chris Lopez
Development Specialist, Special Projects
Community Development commission, County of Los Angeles
700 West Main Street
Alhambra, CA 91801
CLopez@labtc.org

**Re: Vermont Corridor Project – Draft Environmental Impact Report,
(SCH No. 2017051013)**

Dear Mr. Lopez:

I am writing on behalf of Laborers International Union of North America, Local Union No. 300 and its members living in the County of Los Angeles (collectively “LIUNA” or “Commenters”) regarding the Draft Environmental Impact Report (“DEIR”) prepared for the Vermont Corridor Project (SCH No. 2017051013) (“Project”).

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts. Commenters request that the County of Los Angeles address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

1

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Drury".

Richard Drury

Comment Letter No. 11

Lozeau Drury LLP
Richard Drury
on behalf of Labors International Union of North America, Local Union No. 300
410 12th Street, Suite 250
Oakland, CA 94607
December 19, 2017

Response to Comment 11-1

The comment states the letter is written on behalf of the Labors International Union of North America, Local Union No. 300 (LIUNA), and its Los Angeles County members. The comment claims that the Draft EIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impact, but provides no specifics. The comment suggests that the County should address the shortcomings in a revised Draft EIR and recirculate the revised Draft EIR prior to approval. The comment states it reserves the right to supplement the comments during the review of the Final EIR for the Project and at the public hearings. The comment does not identify any specific shortcomings of the Draft EIR analysis or mitigation measures, and no specific response is therefore possible or required. Furthermore, and contrary to the allegation in this comment, the Draft EIR complied fully with all of CEQA's requirements. The comment presents no substantial evidence to the contrary about any specific impact area. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Since the commenter provides no substantial evidence regarding the alleged inadequacy of the Draft EIR, the claims contained in the comment letter would provide no basis for changes to the Draft EIR.

The general allegations in this comment will be forwarded to the decision-makers for consideration.

From: JEREY OJEAH [<mailto:jerey@flash.net>]
Sent: Tuesday, December 19, 2017 6:01 PM
To: Christopher Lopez <Christopher.Lopez@lacdc.org>
Subject: Redevelopment

Hello Mr Chris Lopez,

Love all this redevelopment, but has killed my business, the past two years all kinds of project has been going on here, and it has caused me to lose my business, due to all the construction on Wilshire, Virgil, Shatto and now more. I have been here for 6 years and I have not been able to make rent this past year bec of none stop construction to my retail store on 6th and Westmoreland. Who benefits from this?

Jerrey

Comment Letter No. 12

Jerrey Ojeah
December 19, 2017

Response to Comment 12-1

The comment generally states that the commenter's business has been adversely affected by construction activity in the area. The commenter's business is located near the intersection of 6th and Westmoreland, one block east of Site 1's frontage on Shatto Place and two blocks east of Vermont Avenue. Although the specific address of the commenter's business is not provided, there is a mixed use building with ground floor retail located on the northwest corner of 6th Street and Westmoreland Avenue, and a small retail center located on the northwest corner 6th Street and Westmoreland Avenue.

The Draft EIR analyzes construction and operation impacts related to air quality, noise and traffic in Sections 4.2, 4.10 and 4.14, respectively. The Draft EIR shows that none of the localized air quality thresholds would be exceeded during construction activities on Sites 1 and 2, which are closest to these retail locations (Tables 4.2-17 and 4.2-19 on pages 4.2-35 and 4.2-36 of the Draft EIR, respectively), and localized air quality impacts would therefore be less than significant. With respect to construction noise, the Draft EIR identifies a sensitive receptor location (Location #6) at the residential building located just north of the mixed use building on the northwest corner of 6th Street and Westmoreland Avenue (Draft EIR, Figure 4.10-1, page 4.10-11). The Draft EIR analysis of construction noise shows that construction noise impacts at this location would be less than significant after mitigation (Draft EIR, Table 4.10-16, page 4.10-36). The traffic analysis for the Project demonstrates that the Project would not significantly impact the intersections of 6th Street/Shatto Place, 6th Street/Rampart Boulevard, and 6th Street/Alvarado Street (Draft EIR, Table 4.14-17, page 4.14-47). In addition, the Project would not include any lane closures or street closures on 6th Street east of Shatto Place, or on Westmoreland Avenue (Draft EIR, pages 3-34 through 3-35), where the retail uses are located. Accordingly, it is not expected that Project construction or operation would adversely affect the retail uses located at 6th Street and Westmoreland Avenue. Nevertheless, as noted in Responses to Comments 8-1 through 8-4, the Project Developer will identify a point of contact for addressing impacts to neighboring uses that may arise during construction. This comment will be forwarded to the decision-makers for consideration.

2.4 COMMUNITY MEETING NOVEMBER 28, 2017

The following comments were provided by participants at the November 28, 2017 Draft EIR Community Meeting. Six individuals spoke at this meeting, including:

- David Rockello, Rampart Village Neighborhood Council
- Rachel Luckey, Rampart Village Neighborhood Council
- Cat Yang, KoreaTown Immigrant Worker Alliance (KIWA)
- Lois Arkin, Los Angeles Eco-Village
- Cuesta Gleason
- Greg Whitman

Comments/questions provided by these individuals and responses are provided below.

Commenter: David Rockello, Rampart Village Neighborhood Council

Response to Comment H-1

The commenter asked how much the Project addresses the community's needs for low cost housing and homelessness. Although the need for low cost housing and homelessness is not an environmental impact issue, the proposed development on Site 3 provides a 100 percent senior affordable housing project containing 72 units. Senior affordable housing is defined as units for seniors making between 60 percent and 30 percent of the average median income (AMI). In addition, as stated in the Draft EIR (Section 3.0 Project Description, page 3-23) the development of new units on Site 2 would provide for a mix of residential units to meet various income levels (82 studio, 46 one-bedroom, 44 two-bedroom), and would include provisions for affordable units (see Response to Comment H-8). Further, as stated in the Draft EIR (Section 3.0 Project Description, page 3-18), Site 1 would include the construction of a new building to consolidate Department of Mental Health (DMH) employees presently located in the Vermont Corridor into one location, which will provide upgraded facilities to improve communication and efficiency of the DMH to provide services to the community including for low income and homeless individuals. DMH is the County agency that is primarily responsible for implementing Measure H, which was approved by County voters in March, 2017, and provides a dedicated funding source for ongoing services and housing for the County's homeless populations. Furthermore, employees of Workforce Development, Aging and Community Services (WDACS), presently located on Site 2, will be relocated to new and upgraded facilities on Site 1, in order to achieve similar operating efficiencies. Responsibilities of this department include job training programs to address homelessness. As such, the Project would serve to both directly and indirectly address affordable housing and homelessness issues in the City and County.

Commenter: Rachel Luckey, Rampart Village Neighborhood Council

Response to Comment H-2

The commenter asked how much low income housing is provided on Site 2. Although the adaptive reuse of the existing DMH building on Site 2 would consist of market rate housing, new commercial development and market-rate housing within this building would be subject to City requirements, including the Affordable Housing Linkage Fee Ordinance. As noted in Response to Comment H-1, the development of residential units within the new residential building and new commercial development on the WDACS office building site on Site 2 would be subject to City affordable housing requirements in effect at the time approvals are requested from the City. Originally the development on Site 3 was also

proposed to be a market rate residential structure. However, the Project Developer modified the plans for this development, and the proposed development on Site 3 is now a 100 percent senior affordable housing project containing 72 units.

Response to Comment H-3

The commenter asked who the Project Developer/County has been working with at the City. As stated in the Draft EIR (Section 3.0 Project Description, page 3-36) the City of Los Angeles is the Responsible Agency with discretionary approval authority over Site 2. The Project Team has coordinated directly with the City of Los Angeles Department of City Planning, City of Los Angeles Department of Transportation, and City public service providers. Direct coordination has also been undertaken with Council Districts 10 and 13.

Response to Comment H-4

The commenter asked for an explanation of 10 traffic impacts at 7 intersections. The Draft EIR identifies that significant and unavoidable impacts would remain at the following intersections after implementation of the Project's mitigation measures (numbers refer to intersection numbers in Table 4.14-1 in Section 4.14, Transportation and Traffic, of the Draft EIR):

Existing with Project Phases I and II Conditions

- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Interim Year 2021 with Project Phase I

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Buildout Year 2023 with Project Phases I and II

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 10. Vermont Avenue & 3rd Street (PM Peak)
- 18. Vermont Avenue & 6th Street (AM and PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (AM and PM Peak)
- 30. Vermont Avenue & Olympic Boulevard (AM and PM Peak)
- 33. Vermont Avenue & Washington Boulevard (PM Peak)
- 35. Vermont Avenue & I-10 Eastbound Ramps (PM Peak)

As shown, upon completion of Project buildout in 2023 and implementation of all feasible mitigation, seven intersections would be significantly and unavoidably impacted after mitigation, and three of those intersections would be impacted during both AM and PM peak hours, thus resulting in 10 separate impacts per LADOT criteria.

Response to Comment H-5

The commenter asked about the City approval process for the Project. As of the time of preparing the Final EIR, neither the County nor the City has approved the Project. Project approvals, if forthcoming, would be obtained as discussed in the Draft EIR (page 3-36), and Final EIR (Section 1.0, Introduction), and

would be provided by the County for Sites 1 and 3, and by the City for Site 2. A publically noticed meeting on recommendations for action on the EIR and the Project will be held before the Los Angeles County Board of Supervisors (the “Board”). Upon completion of the Final EIR and other required documentation, the Board may adopt findings relative to the Project’s environmental effects and a statement of overriding considerations, certify the EIR, and approve the Project. As of the time of the Community Meeting, only the Project’s traffic study had been approved by the City of Los Angeles Department of Transportation, which is necessarily made a part of the Project EIR and did not constitute approval of the Project.

Response to Comment H-6

The commenter asked for an explanation of a Statement of Overriding Considerations. As stated in the Draft EIR (page 1-3) upon completion of the Final EIR and other required documentation, the Board may adopt findings relative to the Project’s environmental effects including a statement of overriding considerations, certify the EIR, and approve the Project. A Statement of Overriding Considerations provides a discussion of the benefits of the Project, and thus the rationale for approving a Project notwithstanding significant and unavoidable environmental impacts with the implementation of feasible mitigation measures. Per Section 15093 of the CEQA Guidelines provides:

- a) *CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”*
- b) *When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*
- c) *If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.*

Response to Comment H-7

The commenter requested as much notice as possible for any County hearings. The comment does not raise any issues on the content of the Draft EIR. Consideration by the Board of recommendations relating to the Project will be publically noticed as required by state law and Board procedure. Members of the public can view searchable agendas for scheduled Board of Supervisors meetings and access agenda-related County information and services directly on the following website: <http://bos.lacounty.gov/Board-Meeting/Board-Agendas>. This site has an email notification service enrollment process for copies of future Board of Supervisors agendas, to which the commenter may subscribe.

Commenter: Cat Yang, KoreaTown Immigrant Worker Alliance (KIWA)

Response to Comment H-8

The commenter asked about affordable units within the new building on the Site 2 parking structure. As stated in the Draft EIR (Section 3.0 Project Description, pages 3-18 through 3-32), the proposed development on Site 2 would involve the reuse and conversion of the existing DMH building into 172 market rate residential units, and construction of 74 new units in a new building on top of a new parking structure. As discussed in the Draft EIR, land use approvals for the new units on Site 2 would be subject to City of Los Angeles requirements. These would include any requirements related to affordable units in the new building on Site 2, as they exist at the time approvals are requested from the City. Proposed affordable housing in the Project would be located on Site 3 in a 100 percent senior affordable housing project containing 72 units.

Response to Comment H-9

The commenter stated that the Project adds density, but does not add green space or open space. As stated in the Draft EIR (Section 4.13 Recreation, pages 4.13-8 through 4.13-10) the Project provides private open space to employees and residents on Sites 1, 2 and 3, and a community recreation center that would provide recreation facilities open to the public on Site 3. Site 1 would include 27,821 square feet of open space (courtyard and passive open space) that would be available for employee use. Site 2 would include 17,900 square feet of open space and amenities that would be available for resident use, which would meet the open space requirement established by the City. Site 3 would include 4,990 square feet of open space for resident uses and an approximately 13,200 square foot public community recreation center. As stated in the Draft EIR (Section 4.13 Recreation, page 4.13-12) per Regulatory Requirement RR REC-2, the Developer would pay park fees to the City of Los Angeles in accordance with the requirements of LAMD Section 12.33. See also Response to Comments 10-3 and 10-4. This comment will be forwarded to the decision-makers for consideration.

Response to Comment H-10

The commenter asked if proposed open space is public or private. As stated in the Draft EIR (Section 4.13 Recreation, pages 4.13-8 through 4.13-10) the Project provides private open space for employees and residents, respectively, on Sites 1, 2 and 3, and a community recreation center that would be open to the public on Site 3 of approximately 13,200 square feet. As stated in the Draft EIR (page 4.13-12) per Regulatory Requirement RR REC-2, the Developer will pay park fees to the City of Los Angeles in accordance with the requirements of LAMC Section 12.33. See also Response to Comment 10-4. This comment is noted and will be forwarded to the decision-makers for consideration.

Response to Comment H-11

The commenter stated the County should promote transit ridership. As stated in the Draft EIR (Section 4.14 Transportation and Traffic, page 4.14-61), the Project includes Mitigation Measure MM TR-a1 which is a Transportation Demand Management Program which promotes non-auto travel and reduced use of single-occupant vehicle trips among office workers on Site 1. Strategies for the Project's TDM program include incentives for using alternative travel modes, such as discounted transit passes for employees and "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site (Draft EIR, page 4.14-62). The Project would also promote transit ridership by concentrating a major County employment center within two blocks of a Metro Rail Red/Purple Line station, which is supported by Metro (see Response to Comment 4-5). This comment will be forwarded to the decision-makers for consideration.

Commenter: Lois Arkin, Los Angeles Eco-Village**Response to Comment H-12**

The commenter asked whether the County surveyed employees for commuting patterns; whether employees would relocate to housing provided by the Project; whether a reduced number of parking spaces would provide more housing; whether residences should be reserved for car-less households; and whether people should be paid not to drive. As stated in the Draft EIR (page 4.14-61), the Project's trip generation is largely based on DMH employee travel patterns in the Vermont Corridor, which would be consolidated to Site 1 upon Project construction. It is not anticipated that employee travel patterns would change due to the Project or that employees would be relocated due to the provision of housing. Regarding car-less households, under applicable County Code (Site 3) and City Code (Site 2), residential spaces must be provided. In addition, the Project would employ a Transportation Demand Management (TDM) program for Site 1 based on the most effective way to reduce auto travel by County employees and visitors influenced by current County employee travel patterns. Paying employees not to drive is beyond the scope of the Draft EIR and is an DMH operational/budgetary issue. As stated in the Draft EIR (pages 3-26 through 3-32), parking for Site 1 is based on what the County has determined to be required to serve employees and visitors to County buildings based on existing experience, and parking supply for residential and community center uses on Sites 2 and 3 is based on existing regulatory requirements. Parking supply for the Project has been designed to avoid parking spillover into neighborhood (Draft EIR, page 5-4); to significantly reducing the number of parking spaces determined to be necessary as suggested by the commenter would likely result in significant neighborhood spillover parking. All feasible mitigation to reduce traffic impacts has been incorporated into the Project (Draft EIR, page 4.14-60 through 4.14-62).

Response to Comment H-13

The commenter asked if congestion pricing was considered. Congestion pricing - sometimes called value pricing - is a way of harnessing the power of the market to reduce traffic congestion. Congestion pricing works by shifting purely discretionary rush hour highway travel to other transportation modes or to off-peak periods, taking advantage of the fact that the majority of rush hour drivers on a typical urban highway are not commuters.² As such, congestion pricing, as a concept, applies to highways or other transportation modes for which varying fees can be charged at different times. Since the Project Sites are served by a network of City streets, this concept would not apply to the Project. To the extent that flexible work hours or incentives to avoid peak travel hours could be included in the Project's TDM program, this program would be based on the most effective way to reduce auto travel by County employees and visitors influenced by current County employee travel patterns.

Commenter: Cuesta Gleason**Response to Comment H-14**

The commenter stated that market rate housing is not affordable in this neighborhood; the Project should reduce parking and provide more affordable housing. As stated in the Draft EIR (pages 3-26 through 3-32), parking for Site 1 is based on what the County requires to serve employees and visitors to County buildings, and parking for Sites 2 and 3 are based on regulatory requirements. As stated in the Draft EIR (pages 3-23 through 3-26), Site 2 provides for a mix of residential units to meet various income levels, and

² U.S. Department of Transportation, Federal Highway Administration, "Congestion Pricing, A Primer: Overview", October, 2008.

Site 3 includes the development of 72 units, 100 percent of which are senior affordable housing units. New development on Site 2 would also pay an affordable housing linkage fee in accordance with City requirements. See also Response to Comment 10-1.

Commenter: Greg Whitman

Response to Comment H-15

The commenter asked what the Transportation Demand Management (TDM) program is for the Project, and what is the reduction with the TDM program. The TDM is addressed in accordance with Los Angeles Department of Transportation policies and methodologies. As stated in the Draft EIR (Section Transportation and Traffic, pages 4.14-61 through 4.14-61), Mitigation Measure MMTR-a1 is the Transportation Demand Management Program for the Project and includes details of potential elements and criteria for such program. Although the Project's traffic analysis was required by LADOT methodology to limit the credit taken for TDM measures to 10%, the County has current experience in encouraging employees to utilize travel modes other than single occupant vehicles. Based on the most recent survey of DMH employees in the Vermont Corridor (see Appendix A to this Final EIR), approximately 37% of current DMH employees use travel modes to work other than driving alone (23% public transportation, 10% carpool, 4% other/walk/bicycle). DMH would be expected to continue to utilize this experience to identify and implement the most effective measures available to reduce employee auto travel. See also Response to Comment 10-5.

3.0 MITIGATION MONITORING AND REPORTING PROGRAM

3.1 INTRODUCTION

The California Environmental Quality Act (“CEQA”) requires a lead agency that approves a project for which an Environmental Impact Report or Mitigated Negative Declaration has been prepared to “adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects” (CEQA Guidelines Section 15097). An Environmental Impact Report (“EIR”) has been prepared for the Vermont Corridor Project (“Project”) to address the potential environmental impacts of the Project. Where appropriate, the EIR includes mitigation measures to avoid or substantially lessen the significant environmental impacts associated with the Project. This Mitigation Monitoring and Reporting Program (“MMRP”) prepared for the Project is designed to monitor implementation of these mitigation measures. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. This MMRP describes the procedures the Developer of each of the three Project Sites (TCLA for Sites 1 and 2, Meta Housing for Site 3, collectively “Developers”) shall use to implement the mitigation measures adopted in connection with the approval of the Project and the methods of monitoring and reporting on such actions. “Monitoring” is generally an ongoing or periodic process of project oversight. “Reporting” generally consists of a written compliance review that is presented to the decision making body or authorized staff person. For this MMRP, the County of Los Angeles is the Lead Agency for the Project. This MMRP would be adopted by the County of Los Angeles Board of Supervisors. The Project will require discretionary approvals by the County and other governmental agencies. Therefore, the Project is subject to environmental review requirements under CEQA. The County is identified as the “Lead Agency” for the Project in accordance with Sections 15051 and 15367 of the CEQA Guidelines, which define the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project. The Project is being undertaken by the Community Development Commission (“CDC”), on behalf of the County.

3.2 PURPOSE

It is the intent of this MMRP to:

1. Verify compliance with the required Project Design Features, regulatory requirements, and mitigation measures of the EIR;
2. Provide a methodology to document compliance with the required Project Design Features, regulatory requirements, and mitigation;
3. Provide a record and status of Project Design Features, regulatory requirements, and mitigation requirements;
4. Identify monitoring and enforcement agencies;
5. Establish and clarify administrative procedures for the clearance of Project Design Features, regulatory requirements mitigation measures;
6. Establish the frequency and duration of monitoring and reporting; and
7. Utilize the existing agency review processes wherever feasible.

3.3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMRP shall be in place throughout all phases of the Project. The Developers, as the entities responsible for implementing the Project Design Features, regulatory requirements, and mitigation measures, shall be obligated to provide documentation concerning implementation of the Project Design Features, regulatory requirements, and mitigation measures to the appropriate monitoring agency as provided for herein.

Table 1 below lists each required Project Design Feature, regulatory requirement, and mitigation measure for the Project and identifies the following:

- **Responsible Implementation Party**—The entity responsible for the implementation of the Project Design Feature, regulatory requirement, or mitigation measure.
- **Enforcement Agency** —The agency with the power to enforce the Project Design Feature, regulatory requirement, or mitigation measure.
- **Monitoring Agency**—The agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase**—The phase of the Project during which the Project Design Feature, regulatory requirement, or mitigation measure shall be monitored.
- **Monitoring Frequency**—frequency at which the Project Design Feature, regulatory requirement, or mitigation measure shall be monitored.
- **Actions Indicating Compliance** —The action(s) by which the enforcement or monitoring agency indicates that compliance with the required Project Design Feature, regulatory requirement, or mitigation measure has been implemented.

As evaluated in the Draft EIR, Project impacts related to certain environmental topics were determined to be less than significant. Therefore, no mitigation measures were identified in the Draft EIR for those environmental issues. Table 1 below lists only those environmental topics for which Project Design Features, regulatory requirements, and mitigation measures were identified in the Draft EIR.

3.4 PROGRAM MODIFICATION

After review and approval of the final MMRP by the Lead Agency, minor changes and modifications to the MMRP are permitted. Modifications that achieve the same level of effectiveness as the original Project Design Features, regulatory requirements, and mitigation measures can be proposed by the Developers or successors in interest, or by the County, and are subject to the approval by the County of Los Angeles. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the prototypical nature of the MMRP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
4.1. AESTHETICS									
4.1.1. Aesthetic/Views	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.1.2. Shade/Shadow	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.1.3. Light/Glare			No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
	PDF LG-1: Project outdoor lighting shall be designed and installed with shielding from adjacent residential properties, the public right-of-way, and from above.			Developer (Sites 1 and 2 – TCLA or successor in interest); (Site 3 – Meta Housing or successor in interest)	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	Community Development Commission, County of Los Angeles (CDC)	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
	PDF LG-2: All Project buildings, parking structures, and signage within the Project Sites shall be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Exterior materials, including glazing shall have Visible Light Reflectance (Exterior) of 34 percent or less.				Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection
		The following Regulatory Requirement is applicable to Site 2 only. RR LG-1: Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source:		Developer	City of Los Angeles, Department of Building and Safety	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units. 2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units. 3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.							
4.2 AIR QUALITY	No Project Design Features are required.			N/A	N/A	N/A	N/A	N/A	N/A
		RR AQ-1: The Project shall comply with SCAQMD Rule 403 regarding fugitive dust.		Developer	South Coast Air Quality Management District	CDC	Before Construction & During Construction	Include in construction documents; obtain plan check approval; implement measures	Field inspection Sign-off
		RR AQ-2: The Project shall comply with SCAQMD Rule 1113 regarding Architectural Coatings.		Developer	South Coast Air Quality Management District	CDC	Before Construction & During Construction	Include in construction documents; obtain plan check approval; implement measures	Field inspection Sign-off
		RR AQ-3: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			MM AQ-1: Developer shall use Tier IV off-road equipment with the following features if reasonably available: alternative fuels (biodiesel, compressed natural gas, propane, etc.), electric equipment, diesel oxidation catalyst, and newer tier engines with more stringent U.S. EPA tier emissions standards than is anticipated from the statewide fleet mix.	Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction	Identify construction equipment and emissions standards; include in construction documents; implement measures	Field inspection Sign-off
4.3. CULTURAL RESOURCES									
4.3.1. Historical Resources	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.3.2. Archaeological Resources	No Project Design Features are required.			N/A	N/A	N/A	N/A	N/A	N/A
			MM CU-1: A qualified professional archaeologist shall monitor all ground disturbing activities of the project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall cease within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer	Developer	County of Los Angeles, Department of Regional Planning (Sites 1 and 3); City of Los Angeles Department of City Planning (Site 2)	CDC	As needed during Grading	Identify and obtain County or City approval of an archaeologist	Submittal of a compliance report by a qualified archaeologist

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered unique archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.						
		<p>RR CU-1: If a unique archaeological resource were to be discovered during construction of a project, adherence to the following PRC Section 21083.2 protocol is required:</p> <ul style="list-style-type: none"> The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. Ground disturbing activities shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site. 		Developer	County of Los Angeles, Department of Regional Planning (Sites 1 and 3) City of Los Angeles, Department of City Planning, Office of Historic Resources (Site 2)	CDC	As Needed During Grading	Consultation with archaeologist if resource(s) are discovered	Submittal of a compliance report by a qualified archaeologist

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<ul style="list-style-type: none"> Construction personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials. The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. 							
		<p>RR CU-2: California Health and Safety Code Section 7050.5 establishes specific requirements that must be followed in the event that human remains are discovered during excavation activities. The requirements include, but are not limited to the following procedure that shall be observed:</p> <ul style="list-style-type: none"> Cease ground-disturbing activities and contact the County Coroner immediately. <ul style="list-style-type: none"> If the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner has 24 hours to notify the NAHC. The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. 		Developer	County of Los Angeles, Department of Regional Planning (Sites 1 and 3) City of Los Angeles, Department of City Planning, Office of Historic Resources (Site 2)	CDC	As Needed During Grading	Consultation with archaeologist in consultation with Native America monitor upon discover of resource(s)	Submittal of written evidence of compliance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<ul style="list-style-type: none"> If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC. 							
4.3.3. Paleontological Resources	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		<p>RR CU-3: If a unique paleontological resource were to be discovered during construction of a project, PRC Section 21083.2 requires adherence to the following protocol:</p> <ul style="list-style-type: none"> The County of Los Angeles, Department of Regional Planning, and Department of City Planning, Office of Historic Resources shall be notified of the discovery. Work shall cease in the area of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. The Developer shall choose the qualified paleontologist, subject to the approval of County of Los Angeles, Department of Regional Planning on Sites 1 and 3, and Department of City Planning, Office of Historic Resources on Site 2. Construction activity may continue unimpeded on other portions of the Project Site. Construction personnel of the Project shall be prohibited from collecting or moving any paleontological materials and associated materials. The found deposit shall be treated in accordance with federal, State, and local 		Developer	County of Los Angeles, Department of Regional Planning (Sites 1 and 3) City of Los Angeles, Department of City Planning, Office of Historic Resources (Site 2)	CDC	As Needed During Grading	Consultation with paleontologist if resource(s) are discovered	Submittal of a compliance report by a qualified paleontologist

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		guidelines, including those set forth in PRC Section 21083.2. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the paleontologist. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after treatment measures are implemented, the paleontologist shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered resources, the significance of the resources, and the treatment of the recovered resources. Any fossils recovered would be deposited in an accredited and permanent scientific institution.							
4.4. ENERGY	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		RR EN-1: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
4.5. GEOLOGY AND SOILS	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		County Requirements (Sites 1 and 3) RR GS-1: Structural designs will need to consider seismic (earthquake) loading factors in compliance with Title 26 of the Los Angeles County Code.		Developer	County of Los Angeles, Department of Public Works	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		County Requirements (Sites 1 and 3) RR GS-2: Slope stability, expansive soils, compressible soils and other similar engineering geology and geotechnical hazard considerations are addressed by the grading standards in the State of California Building Code, Appendix J of Title 26 of the Los Angeles County Code, and by the general requirement for engineering investigation reports, and by many of the implementation programs within other categories.		Developer	County of Los Angeles, Department of Public Works	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		County Requirements (Sites 1 and 3) RR GS-3: A Project design-specific geotechnical and engineering geology report is required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current County of Los Angeles Department of Public Works Geotechnical and Materials Engineering Division (GMED) guidelines. The investigation is		Developer	County of Los Angeles, Department of Public Works	CDC	Before Construction	Submit report; obtain approval	Issuance of applicable grading permit

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<p>required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas; groundwater; and/or other geotechnical and engineering geologic hazards. The design and construction recommendations will be incorporated into the foundation and structural design of proposed project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by GMED for construction of such improvements. Construction will occur in accordance with the approved plans.</p>							
		<p>City Requirements (Site 2) RR GS-4: In accordance with the Los Angeles Building Code, Los Angeles Municipal Code (LAMC) Chapter IX, Article 1, the Project Developer, or successor in interest, shall have a Geotechnical Study prepared for the Project Site that shall be approved by the Department of Building and Safety prior to issuance of building and grading permits. The Project shall be designed and constructed in accordance with the recommendations provided in the Geotechnical Study, as overseen by the Department of Building and Safety.</p>		Developer	City of Los Angeles Department of Building and Safety	CDC	Before Grading	Submit report; obtain approval	Issuance of applicable grading permit

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		City Requirements (Site 2) RR GS-5: Earthwork activities associated with the grading and export of soil shall occur in accordance with City requirements, as specified in the Los Angeles Building Code and CBC and through the grading plan review and approval process, including a haul route approval as specified in the LAMC.		Developer	City of Los Angeles Department of Building and Safety	CDC	Before Grading	Submit report and haul route application; obtain approval	Issuance of applicable grading permit; issuance of haul route permit
		City Requirements (Site 2) RR GS-6: Project building design and construction shall conform to the current building and safety design provisions of the LAMC, which incorporates the CBC, including all provisions related to seismic activity.		Developer	City of Los Angeles Department of Building and Safety	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		Metro Requirements (Sites 1, 2 and 3) RR GS-7: The Developer shall comply with the requirements of Metro’s most recent “Design Criteria and Standards, Volume III, Adjacent Construction Design Manual.” The general requirements include, but are not limited to, the following: <ol style="list-style-type: none"> 1. Facility or structure drawings and calculations showing the relationship between the proposed Project and Metro facilities shall be submitted for Metro review. 2. Submittals shall be made at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review. 3. If uncertainty exists on the possible impacts before submitting a formal letter requesting a review, the Metro 		Developer	Los Angeles County Metropolitan Transportation Authority	CDC	Before Construction	Submit application; obtain approval	Metro approval

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<p>Third Party Administrator (Permits) shall be contacted for an informal evaluation of the amount of detail required for Metro review.</p> <p>4. A period of 30 working days shall be allowed for the initial and each successive review as required.</p> <p>5. The project proponent shall reimburse Metro for any technical review or support services costs.</p> <p>6. Each part of the project's design may be reviewed and approved by Metro, and after written acceptance of the design, the project proponent must notify Metro prior to the start of construction as noted therein.</p> <p>Due to the proximity of the tunnel and the uncertainty that exists on the possible impacts, before submitting a formal letter requesting a review, the Developer shall contact the Metro Third Party Administrator (Permits) for an informal evaluation of the amount of detail required for Metro review. In addition, prior to any geotechnical or other site investigation requiring subsurface exploration (e.g., geotechnical drilling, monitoring wells), the Developer shall obtain approval of drilling locations, drilling depths, and downhole activities from Metro. The Developer shall obtain prior written approval to proceed from Metro prior to commencing exploration activities; written approval shall be submitted to County Department of Regional</p>							

Table 3-1
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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		Planning and GMED. Similarly, the Developer shall submit to GMED a written approval from Metro that final project design may be developed.							
4.6. GREENHOUSE GAS EMISSIONS	The Project would incorporate the water conservation features set forth in PDF USS-2 through USS-4 that would reduce GHGs associated with water consumption. These features would exceed Code requirements for water conservation.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		RR GHG-1: The Project shall be built in accordance with all applicable provisions of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2).		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
4.7 HAZARDS AND HAZARDOUS MATERIALS	PDF HH-1: At Site 1, the four triple-nested soil gas wells shall be retained for additional sampling, if needed. When no longer needed, because methane concentrations are not detected at or above the Landtec GEM 2000™ instrument detection limit of 0.1 percent or the flame ionization detector (FID) detection limit of 0.1 parts per million by volume (ppmv), they shall be removed/abandoned in accordance with applicable regulations.			Developer	County of Los Angeles, Department of Public Works	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		RR HH-1a: For Site 1 and Site 3, Los Angeles County Building Code Sections		Developer	County of Los Angeles,	CDC	Before Construction	Include in design; obtain plan check	Plan approval and issuance of applicable building

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		110.3 and 110.4 shall be followed regarding methane gas mitigation requirements and standards. Following approval of a methane mitigation plan for the respective site by the County Building Official, redevelopment of each site shall be performed in accordance with all Los Angeles County Building Code's methane-related requirements.			Department of Public Work		& During Construction	approval; pass final inspection	permit; issuance of Certificate of Occupancy
		RR HH-1b: For Site 2, the City of Los Angeles Methane Ordinance (Ord. No. 175,790) shall be followed, including methane gas sampling and pressure testing, installation, and certification, if required, of a City of Los Angeles-approved methane mitigation system. Following approval by City of Los Angeles Department of Building and Safety (LADBS) and City of Los Angeles Fire Department (LAFD), redevelopment of the site by the Project shall be performed in accordance with all LADBS and LAFD methane-related requirements.		Developer	City of Los Angeles Department of Building and Safety, LAFD	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		RR HH-2: Prior to any demolition, remodeling, and/or renovation activities at the site, untested suspect asbestos-containing materials (ACMs) that may be disturbed, including concrete joint compound, shall be sampled and analyzed in accordance with applicable regulations (including testing concrete joint compound for polychlorinated biphenyls [PCBs]). Abatement of known and suspect ACMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs) in accordance with applicable regulations. In the		Developer	South Coast Air Quality Management District	CDC	Before Demolition	Include in construction documents; obtain plan check approval; implement measures	Issuance of applicable demolition permit; compliance report submitted to SCAQMD

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		event that renovation or demolition activities do not take place, known and suspect ACMs at the site shall be managed in accordance with applicable regulations, including the preparation and implementation of an asbestos operation and maintenance (O&M) plan. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as federal Occupational Safety and Health Administration, California OSHA, South Coast Air Quality Management District, and California Environmental Protection Agency, Department of Toxic Substances Control).							
		RR HH-3: Prior to any demolition, remodeling, and/or renovation activities at the site, untested possible lead-based paint (LBP) and other lead-containing materials (LCMs) that may be disturbed shall be sampled and analyzed for total lead content. Abatement of known and possible LBP and other LCMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the LBP and other LCMs) in accordance with applicable regulations. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as United States Department of Housing and Urban Development, California Department of Public Health, and Los Angeles County Department of Health Services).		Developer	Los Angeles County Public Health Department (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Demolition	Include in construction documents; obtain plan check approval; implement measures	Issuance of applicable demolition permit
		RR HH-4: Prior to proposed redevelopment, possible polychlorinated biphenyls		Developer	County of Los Angeles, Department of	CDC	Before Demolition	Include in construction documents; obtain	Issuance of applicable demolition permit

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		(PCB)-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes, shall be disposed of or recycled consistent with applicable regulations and regulatory agency guidelines such as the Integrated Waste Management Act, Beverage Container Recycling and Litter Reduction Act, and California Department of Resources Recycling and Recovery requirements.			Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)			plan check approval; implement measures	
		RR HH-5: A Soil Management Plan (SMP) shall be prepared prior to, and implemented during, site redevelopment activities that would result in the exposure of soils at the site. The SMP shall include, but not be limited to, dust suppression measures in accordance with applicable regulations, methods of monitoring for impacted soil, handling and disposal procedures for impacted soil that is encountered, and procedures for testing of soil imported to or exported from the site. The SMP shall be prepared with local agency oversight, such as the Los Angeles County Fire Department's Health Hazardous Materials Divisions – Site Mitigation Unit.		Developer	Los Angeles County Fire Department's Health Hazardous Materials Divisions – Site Mitigation Unit (LACFD SMU).	CDC	Before Grading	Submit remediation plans; obtain approvals	Plan approval and issuance of applicable grading permits
		RR HH-6: Additional regulatory compliance actions are required on Site 1 to address conditions associated with petroleum impacts in soil and groundwater, as identified in the Phase II ESA, prior to construction. As required under existing regulations in conjunction with standard construction practices, these actions would occur		Developer	LACFD SMU	CDC	Before Grading	Submit remediation plans; obtain approvals	Plan approval and issuance of applicable grading permits

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		at the western portion of Site 1 in the vicinity of on-Site abandoned oil wells, and at the eastern portion of Site 1 (at the parking structure site) in the area of the onsite abandoned UST. Site 1 construction will comply with the requirements of LACFD SMU.							
			MM HH-1: The anomaly identified in northwest portion of Site 1 by the geophysical survey shall be probed and identified to confirm that it is not an oil well. The information gathered on the Ruhland wells shall then be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment.	Developer	DOGGR, LADBS	CDC	Before Grading	Submit oil well report; obtain approvals	Plan approval and issuance of applicable grading permits
			MM HH-2: Prior to the commencement of any construction activity at Site 2, a geophysical survey to locate the on-site oil wells shall be undertaken and shall follow California Occupational Safety and Health Administration guidelines for grading and/or shoring. Second, the Developer shall submit Project plans to the Southern District office of the California Department of Conservation's Division of Oil, Gas, & Geothermal Resources (DOGGR) that show, at a minimum, the boundary of the development site property with all known wells plotted on the property, final grade of the development site property, and a visual bar scale for review as a part of its	Developer	DOGGR	CDC	Before Construction	Submit oil well report; obtain approvals	Plan approval and issuance of applicable grading permits

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			Construction Site Well Review Program. The DOGGR review may include recommendations such as: possible re-abandonment of the on-site oil wells; building/structure redevelopment setbacks and/or other construction-related requirements above or adjacent to the on-site oil wells; the installation of vent cones and related venting-related methane mitigation system above the soil wells and beneath the building slabs. The Project shall incorporate DOGGR's recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells. Any methane mitigation system associated with this measure shall not conflict with Los Angeles County's methane gas mitigation requirements and standards for Site 1, or the City of Los Angeles Methane Ordinance for Site 2.						
4.8. HYDROLOGY AND WATER QUALITY	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		RR HWQ-1: Compliance with applicable National Pollutant Discharge Elimination System ("NPDES") permit requirements and the Los Angeles Regional Water Quality Control Board Municipal Storm Water permit ("MS4 permit") is required.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction
		RR HWQ-2: Runoff from parking lots located on Sites 1 and 3 will be treated, as		Developer	County of Los Angeles, Department of	CDC	Before Construction	Include in design; obtain plan check	Plan approval and issuance of applicable building

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		required by County's LID Ordinance, prior to discharging into existing storm drain systems. Runoff from Site 2 will be treated as required by the City's LID Ordinance.			Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)		& During Construction	approval; pass final inspection	permit; issuance of Certificate of Occupancy
		RR HWQ-3: All wastes from construction of the Project will be disposed of as required by federal, State, County (Sites 1 and 3), and City (Site 2) regulations. Appropriately labeled recycling bins will be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes will be taken to an appropriate landfill. Toxic wastes will be discarded at a licensed regulated disposal site.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction
		RR HWQ-4: Leaks, drips, and spills will be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains as required by the NPDES Construction General Permit.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction
		RR HWQ-5: As required by the NPDES Construction General Permit, material spills will be prohibited from being hosed down at the pavement. Dry cleanup methods will be required.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		RR HWQ-6: During construction, where truck traffic is frequent, gravel approaches and dirt tracking devices will be used to reduce soil compaction and limit the tracking of sediment into streets as required by the NPDES Construction General Permit.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction
		RR HWQ-7: As required by the NPDES Construction General Permit, all construction vehicle/equipment maintenance, repair, and washing will be conducted away from storm drains. All major repairs will be required to be conducted at an appropriate location. Drip pans or drop cloths will be required to catch drips and spills.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Install BMPs; pass inspection	Field inspection sign-off during construction
		RR HWQ-8: Project construction will comply with the County's NPDES and MS4 requirements, and City and County LID requirements for water quality as appropriate to the respective Sites.		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Include in design; obtain plan check approval; Install BMPs; pass inspection	Field inspection sign-off during construction; plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
4.9 LAND USE AND PLANNING	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.10 NOISE	No Project Design Features are required.			N/A	N/A	N/A	N/A	N/A	N/A
		RR NOI-1: The Project shall comply with applicable provisions of the County and City Codes relating to the regulation of construction noise (i.e., Section 12.08.440 of the County Code (Sites 1 and 3), and Sections 41.40 and 112.05 of the LAMC (Site 2)).		Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of	CDC	During Construction	Complaint response	Field inspection sign-off

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
					Building and Safety (Site 2)				
		RR NOI-2: The Project shall comply with Section 12.08.530 of the County Code (Sites 1 and 3) and Section 112.02 of the LAMC (Site 2) for all new mechanical equipment, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB.		Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
		RR NOI-3: The Project shall comply with Section 12.07.11.2 of the County Code (Sites 1 and 3) and Section 91.1207.11.2 (Allowable Interior Noise Levels) of the LAMC (Site 2), which states interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room.		Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy
			MM NOI-1: Noise and groundborne vibration construction activities whose specific location on the Project Sites may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses.	Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Complaint response; periodic field inspection	Field Inspection sign-off
			MM NOI-2: Flexible sound control curtains of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, capable of reducing noise generation by	Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of	CDC	During Construction	Complaint response; periodic field inspection	Field inspection sign-off

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			at least 10 dBA shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.		Building and Safety (Site 2)				
			MM NOI-3: Noise-generating construction equipment operated at the Project Sites shall be equipped with effective noise control devices (i.e., mufflers, lagging, solar-powered generators, plug-in electrical generators, and/or motor enclosures) consistent with manufacturers' standards. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.	Developer	Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Construction	Complaint response; periodic field inspection	Field inspection sign-off
			MM NOI-4: Temporary noise control barriers such as plywood structures shall be erected at the perimeters of the Project Sites as follows: Site 1 – on the northern, eastern and southern edges of the Shatto Place parking structure site on the western edge along Vermont Avenue; and on the southern edge between Site 1 and Site 2; Site 2 - on the eastern edge of the Site and the southern edge of the Site between the existing County Office building and the edge of the Site, and on the southern	Developer	City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Grading	Submit plans; obtain approval	Field inspection sign-off

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			edge between Site 1 and Site 2; Site 3 – on the northern, western and southern edges of the Site. The noise control barrier shall consist of K-rail with one-inch plywood fencing on top, of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, which shall reduce construction-related noise levels at the adjacent uses by at least 10 dBA. Alternatively, sound control curtains at least 8 feet in height and capable of reducing construction-related noise levels at the adjacent uses by at least 10 dBA shall be installed on the identified edges of the Project Sites. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. The temporary barrier shall remain in place until all windows have been installed and all grading and excavation activities on the Project Sites are complete.						
			MM NOI-5: All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors (in accordance with the L.A. CEQA Thresholds Guide, noise-	Developer	LADOT & LADBS	CDC	Before & During Grading & During Construction	Submit haul route application; obtain approval of haul route; periodic field inspection	Field inspection sign-off

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Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			sensitive receptors include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks) to the extent feasible.						
			MM NOI-6: Two weeks prior to the commencement of construction at the Project Sites, notification shall be provided to the immediate surrounding off-site properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period, and provides a name, phone number and e-mail address of a point of contact within the construction team who may be contacted to resolve issues related to construction activities that arise during the construction period for the Project.		Los Angeles County Department of Public Health (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Grading & Construction	Provide notice	Field inspection sign-off
4.11. POPULATION, HOUSING, EMPLOYMENT	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.12. PUBLIC SERVICES									
Fire Protection and Emergency Services			No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
	PDF PS-1: The Developer shall implement a Construction Staging and Traffic Management Plan (CSTMP) addressing construction activity on each of the three sites that would outline provisions for on-site security during construction, which could include, but are not			Developer	City of Los Angeles, Department of Transportation	CDC	Before Grading & Construction & During Construction	Submit plan; obtain approval	Issuance of grading permits; issuance of building permits

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
	limited to, temporary security fencing (e.g., chain-link fencing), low-level security lighting, and locked-entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, and providing security personnel to man and patrol the site outside of active construction hours. Additionally, the Construction Staging and Traffic Management Plan shall ensure that routine and emergency access to and around each Site for vehicles and pedestrians is maintained at all times during construction through well-marked entrances.								
		RR-PS-1: The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by California Code of Regulations (CCR) Title 24 standards, the City of Los Angeles Safety Element, and the County Fire Code (Sites 1 and 3) and LAMC Fire Code (Site 2).		Developer	County of Los Angeles, Fire Department (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		RR-PS-2: The Project Developer shall submit a plot plan for approval of access and hydrants by the County Fire Department for Sites 1 and 3, or LAFD for Site 2, prior to the issuance of building permits. The County Fire Department shall coordinate its findings with respect to Sites 1 and 3 with LAFD. The plot plan shall include fire prevention and access features to the satisfaction of the		Developer	County of Los Angeles, Fire Department (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<p>County or LAFD, including the following standard requirements:</p> <ul style="list-style-type: none"> ○ Access for Fire Department apparatus and personnel to and into all structures shall be required. ○ Any required Fire Annunciator panel or Fire Control Room shall be located as required by the Fire Code. ○ Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation. ○ All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation. ○ All structures shall be fully sprinklered pursuant to the Fire Code. ○ No building or portion of a building shall be constructed more than 150 feet from the edge of a designated fire lane. ○ No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel. 							
		<p>RR-PS-3: The Project on Sites 1 and 2 would be built in compliance with the high-rise provisions in the Fire Code and Building Code pertaining to fire-resistant building materials and smoke control. The following safety measures would be implemented.</p> <ul style="list-style-type: none"> ○ <u>Building Design:</u> Fire resistant doors and materials, as well as walkways, wider stairwells and elevator systems (including 		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<p>emergency and fire control elevators with communication systems inside) that meet code requirements.</p> <ul style="list-style-type: none"> ○ <u>Fire Safety Features:</u> Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation; as well as a fire alarm system, building emergency communication system, and a state of the art smoke control system. ○ <u>Emergency Safety Provisions:</u> Implementation of an Emergency Plan in accordance with the Fire Code. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish on on-site Emergency Assistance Center; and establish procedures to be followed during an emergency incident. There would also be provision of on-site emergency equipment and emergency training for personnel to reduce the impacts on the need for emergency medical services. ○ <u>LAFD Access:</u> Access for LAFD apparatus and personnel to each Project Site would be in accordance with the LAFD requirements. 							
Police Protection Services		No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
	<p>PDF PS-2: The Project on all three Sites shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:</p> <ul style="list-style-type: none"> ○ Provide on-site security personnel whose duties shall include but not be limited to the following: <ul style="list-style-type: none"> • Monitoring entrances and exits; • Managing and monitoring fire/life/safety systems; and • Controlling and monitoring activities in the parking facilities. ○ Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas; ○ Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas; ○ Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment; 			Developer	LAPD	CDC	Before Construction	Include in design; coordinate with LAPD	Issuance of building permit

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
	<ul style="list-style-type: none"> ○ Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points; ○ Design public spaces to be easily patrolled and accessed by safety personnel; ○ Design entrances to, and exits from the building, to be open and in view of surrounding sites; and ○ Limit visually obstructed and infrequently accessed “dead zones.” 								
	<p>PDF PS-3: Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Developer shall develop an Emergency Procedures Plan to address emergency concerns and practices. The Plan will be reviewed by the County for Sites 1 and 3, and by LAPD for Site 2. The County shall share the Plan for Sites 1 and 3 with LAPD.</p>			Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Operation	Prepare plans; obtain approvals; coordinate with LAPD	Issuance of Certificate of Occupancy
Schools	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		<p>RR PS-4: Development on Site 2 will be required to pay to the LAUSD the prevailing LAUSD fee. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area.</p>		Developer	Los Angeles Unified School District	CDC	During Construction	Pay fee & obtain certification from LADBS	Issuance of Certificate of Occupancy

Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
Libraries	No Project Design Features are required.	No regulatory requirements are required.	No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
4.13. RECREATION	No Project Design Features are required.		No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
		RR REC-1: Open space shall be provided on Site 2 in accordance with LAMC Section 12.21-G.2.		Developer	City of Los Angeles Department of Building and Safety	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		RR REC-2: The Developer of Site 2 shall pay Park Fees to the City of Los Angeles in accordance with the requirements of LAMC Section 12.33.		Developer	City of Los Angeles Department of Parks and Recreation	CDC	During Construction	Pay fee & obtain certification from LADBS	Issuance of Certificate of Occupancy
4.14. TRANSPORTATION AND TRAFFIC	PDF TR-1: Transportation Initiative Funding. The Developer would make financial contributions to various City transportation initiatives, including the 2010 Bicycle Plan and Vision Zero. These contributions may be used at the City's discretion to fund infrastructure and safety improvements in and around the Study Area. While the funding of these improvements do not reduce the significance of transportation impacts on intersections based on City analysis methodology and impact criteria, they do help to advance the City's policies and goals relating to overall mobility for all travel modes.			Developer	City of Los Angeles, Department of Transportation	CDC	During Construction	Pay fee & obtain certification from LADOT	Issuance of Certificate of Occupancy
		RR TR-1: Construction Management Plan. A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan shall be prepared and submitted to the City for review and approval. The		Developer	City of Los Angeles, Department of Transportation	CDC	Before Grading & Construction & During Construction	Submit plan; obtain LADOT approval	Issuance of grading permits; issuance of building permits

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		<p>Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. In developing the Construction Management Plan, the Project Developer shall contact the LAUSD Transportation Branch and the Principal of Young Oak Kim Academy with regard to school bus and student pedestrian movements during Project construction. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:</p> <ul style="list-style-type: none"> • Prohibition of construction worker parking on nearby residential streets. • Construction-related vehicles shall not park on surrounding public streets. • Temporary traffic control (e.g., flag men) shall be used during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. • Construction activities shall be scheduled to reduce the effect on traffic flow on surrounding arterial streets. • Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible. • Safety precautions for pedestrians and bicyclists through such measures as 							

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
		alternate routing and protection barriers shall be utilized as appropriate. <ul style="list-style-type: none"> Workers shall be required to participate in a carpool registry with the goal of reducing single-occupant automobile trips by construction workers. 							
			MM TR-a1: Transportation Demand Management Program. The Project shall develop and implement a TDM program in accordance with the June 29, 2017 LADOT Transportation Study Assessment letter to promote non-auto travel and reduce the use of single-occupant vehicle trips among the office workers on Site 1. The TDM program would be prepared by the County, and approved by the County Department of Public Works. The TDM program would be submitted to the City (LADOT) for verification that the provisions of the TDM program sufficiently justify the 10 percent trip reduction used in the Project's Traffic Study. The County approval and City verification shall be received prior to issuance of certificate of occupancy for the Site 1 County office building. Examples of strategies that may be, but are not required to be, included in the TDM program, would be the following: <ul style="list-style-type: none"> TDM-related information available in common area Bicycle amenities such as racks and showers 	Developer	City of Los Angeles, Department of Transportation	CDC	During Operation	Prepare Plan obtain County approval; obtain City concurrence; submit annual report	Issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			<ul style="list-style-type: none"> • Incentives for using alternative travel modes • Parking incentives • Contribution to the City’s Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area <p>The following provides further information and description of the various TDM program strategies that may be, but are not required to be, incorporated into the Project’s TDM program (as determined by LADOT review and approval):</p> <p><u>Educational Programs.</u> A transportation management coordinator (TMC) on the building management staff would reach out to employees directly to promote the benefits of TDM.</p> <p><u>Project Design Features to Promote Bicycling and Walking.</u> The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities, or a bicycle valet system. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians. The Project would also contribute a one-time payment of \$50,000 to be deposited into the City’s Bicycle Plan Trust Fund to implement bicycle improvements in the Study Area.</p>						

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			Incentives for Using Alternative Travel Modes. The Project TMC could incorporate various incentives for use of its programs, including discounted transit passes for employees and/or "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site. An additional option could include unbundled parking, which allows for a separate charge for parking from office space and the flexibility to vary the number of spaces rented.						
			MM TR-a2: Transportation Systems Management Improvements. The Project shall fund and coordinate the installation of a traffic monitoring camera at the intersection of Vermont Avenue and 5 th Street and install fiber optic line to connect the camera to LADOT's ATSAC system. The improvement includes installation of high-capacity fiber optic data cables on Vermont Avenue between 5 th Street and Beverly Boulevard, a distance of approximately 4,000 feet. The Developer shall implement this improvement through the City's B-Permit process.	Developer	City of Los Angeles, Department of Transportation	CDC	During Construction	Install improvements; obtain certification from LADOT	Issuance of Certificate of Occupancy
4.15. TRIBAL CULTURAL RESOURCES	No Project Design Features are required.	No regulatory requirements are required.		N/A	N/A	N/A	N/A	N/A	N/A
			MM TCR-1: Prior to issuance of a grading permit, the Developer shall retain a qualified Native	Developer	County of Los Angeles, Department of Regional	CDC	Before Grading & As Needed During	Retain monitor; Ongoing Native American Monitoring during grading;	Submittal of a compliance report by a qualified archaeologist ; submittal of

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			<p>American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading activities within the project site. The Monitor shall photo-document the grading activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determined necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the</p>		<p>Planning (Sites 1 and 3) City of Los Angeles Department of City Planning (Site 2)</p>		<p>Grading & Construction</p>	<p>Consultation with archaeologist if resource(s) are discovered & as needed;</p>	<p>compliance report by Native American Monitor</p>

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
			California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.						
4.16. UTILITIES & SERVICE SYSTEMS									
Wastewater			No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
	PDF USS-1: The Project would not generate wastewater that would require additional treatment beyond that provided to domestic wastewater and sewage lines from bathrooms, restrooms, and kitchens. Kitchen drains would be provided with oil separators, in accordance with and City requirements, to treat wastewater prior to discharge to the on-site sewer system.			Developer	City of Los Angeles Bureau of Sanitation	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		RR USS-1: All wastewater from the Project would be treated according to requirements of the NPDES permit authorized by the LARWQCB.		Developer	City of Los Angeles Bureau of Sanitation	CDC	Before Construction & During Construction	Comply with all applicable permitting requirements	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		RR USS-2: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
					Department of Building and Safety (Site 2)				
Water			No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
	<p>PDF USS-2: The County and Developer commit to the following conservation measures to promote water conservation at Site 1:</p> <ul style="list-style-type: none"> ○ High Efficiency Toilets with a flush volume of 1.1 gallons per flush ○ Domestic Water Heating System located in close proximity to point(s) of use: For typical Office Levels, Electric Water Heaters are provided at floors 2, 5, 8 & 11 to supply hot water to lavatories for the floor below, floor above, and the floor on which the heater is located; for Terrace Level a dedicated electric heater(s) is provided for Showers & Restroom Lavatories; for Ground Floor, a dedicated electric heater is provided for Restroom Lavatories. ○ Individual Metering and billing for water use for commercial unit: Individual metering is provided for each retail space at Ground Level and separate metering is provided for the Office use (single use tenant). ○ Tankless and on-demand Water Heaters: Tankless water heaters (InstaHot) 			Developer	Los Angeles Department of Water and Power	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
	<p>are provided for all pantry sink locations.</p> <ul style="list-style-type: none"> o Drip/Subsurface Irrigation (Micro-Irrigation) is provided for 100 percent of the irrigation system. o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together). o Drought Tolerant Plants: 50 percent of total landscaping o Cistern - captures stormwater runoff as it comes down through the roof gutter system: Capture and reuse cistern water for irrigation. 								
	<p>PDF USS-3: The Developer commits to the following conservation measures to promote water conservation at Site 2:</p> <ul style="list-style-type: none"> o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together). o Drought Tolerant Plants: 50 percent of total landscaping. o CEE Tier 1 High Efficiency Clothes Washers. 			Developer	Los Angeles Department of Water and Power	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy

Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
	<p>PDF USS-4: The Developer commits to the following conservation measures to promote water conservation at Site 3:</p> <ul style="list-style-type: none"> o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together). o Drought Tolerant Plants: 50 percent of total landscaping. o CEE Tier 1 High Efficiency Clothes Washers. 			Developer	Los Angeles Department of Water and Power	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		RR USS-2 (above) would be imposed by existing laws and regulations and would reduce Project impacts related to water.		Developer	City of Los Angeles Bureau of Sanitation	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
Solid Waste			No mitigation measures are required.	N/A	N/A	N/A	N/A	N/A	N/A
	<p>PDF USS-5: The Project will establish a Solid Waste Diversion Program of 50 percent for project operations.</p>			Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Operation	Include in design; obtain plan check approval; submit annual report	Plan approval; documentation of solid waste diversion in annual compliance report; issuance of Certificate of Occupancy
	<p>PDF USS-6: The Project will establish a Solid Waste Diversion Program of 75 percent for project construction.</p>			Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Construction	Include in construction documents; obtain plan check approval; utilize approved solid waste contractors during construction;	Plan approval; submit compliance report

**Table 3-1
Mitigation Monitoring and Reporting Program for the Vermont Corridor Project**

Environmental Impact	Project Design Features	Regulatory Requirements	Mitigation Measures	Implementation Party	Enforcement Agency	Monitoring Agency	When Monitoring is to Occur	Action Required	Actions Indicating Compliance
								comply with waste diversion plan	
	<p>PDF USS-7: Construction contractors shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as demonstrated to the County of Los Angeles Department of Public Works (Sites 1 and 3), or City Department of Building and Safety (Site 2) prior to issuance of demolition or construction permits.</p>			Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Demolition & During Construction	Include in construction documents; obtain plan check approval; utilize approved solid waste contractors during construction	Plan approval; submit compliance report
	<p>PDF USS-8: The Project will provide readily accessible areas around the Project Sites for the deposit, storage, and collection of non-hazardous materials for recycling.</p>			Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	Before Construction & During Construction	Include in design; obtain plan check approval; pass final inspection	Plan approval and issuance of applicable building permit, issuance of Certificate of Occupancy
		<p>RR USS-3: In compliance with AB 939, the Developer would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Project.</p>		Developer	County of Los Angeles, Department of Public Works (Sites 1 and 3) City of Los Angeles Department of Building and Safety (Site 2)	CDC	During Operation	Include in design; obtain plan check approval; submit compliance report	Plan approval; documentation of solid waste diversion in annual compliance report; issuance of Certificate of Occupancy

Source: EcoTierra Consulting, 2018.

4.0 REVISIONS, CLARIFICATIONS AND CORRECTIONS ON THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Project. Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information which clarifies, amplifies, or insignificantly modifies language in the Draft EIR that has become available since publication of the Draft EIR. These changes to the Draft EIR are indicated in this section under the appropriate Draft EIR section or appendix heading. Deletions are shown with strikethrough and additions are shown with underline.

The changes described in this section do not require recirculation of the Draft EIR because they do not result in any new or increased significant environmental impacts of the Project. CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

As demonstrated in this Final EIR, neither the comments submitted on the Draft EIR, the responses to these comments, nor the revisions presented in this section, meet the above criteria for recirculation.

2.0 EXECUTIVE SUMMARY

Section 2.0 Executive Summary, page 2-1, last paragraph, revise as follows:

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building assigned to ~~occupied by DPR staff~~, open parking areas, and carport in the north parking area, and an existing parking structure located at 523 Shatto Place that is connected to the site. Site 2 is currently occupied by two office buildings, which house DMH and WDACS staff, respectively. Site 3 is currently occupied by an office building assigned to housing ~~DPR staff~~,

Section 2.0 Executive Summary, page 2-2, last paragraph, 2nd sentence, revise as follows:

Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with ~~a non-profit housing corporation~~ the affordable housing developer member

of the TCLA team, and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit.

Section 2.0 Executive Summary, page 2-3, under Site 1, 1st paragraph, 2nd sentence, revise as follows:

~~Current~~ DPR employees located on Site 1 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 1.

Section 2.0 Executive Summary, page 2-4, under Site 3, 1st paragraph, 1st sentence, add the following footnote after “senior affordable housing project”:

¹ Senior affordable housing is defined as units for seniors making between 60 percent and 30 percent of the average median income (AMI).

Section 2.0 Executive Summary, page 2-4, under Site 3, 1st paragraph, 2nd sentence, revise as follows:

~~Current~~ DPR employees located on Site 3 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 3.

Section 2.0 Executive Summary, page 2-5, Table 2-1, line 4, revise as follows:

County Office ~~(Occupied)~~

Section 2.0 Executive Summary, page 2-5, Table 2-1, line 28, revise as follows:

County Office ~~(Occupied)~~

Section 2.0 Executive Summary, page 2-12, revise the paragraph as follows:

Alternative 3 – Office Project

Alternative 3, Office Project, would involve using all three Project Sites for County office use, thereby allowing additional consolidation and relocation of County offices to the Vermont Corridor. Under Alternative 3, Site 1 would be developed with a new County office building and parking facilities in the same manner as the Project. Sites 2 and 3 would incorporate the same square footage of use as would occur under the Project. However, this square footage would be provided for office use, rather than residential, retail, and senior affordable housing, ~~and community recreation center uses~~, as would occur under the Project. The community recreation center use would continue to be included in this Alternative, on the ground floor of Site 3.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM CU-1, page 2-25, revise the mitigation measure as follows:

MM-CU-1 A qualified professional archaeologist shall monitor all ground disturbing activities of the project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall ~~stop~~ cease within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered unique

archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM CU-1, page 2-32, revise Impact (4.5-2): as follows:

Site 1 and 3

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be potential hazards at Sites 1 and 3. Moreover, there are no known physical characteristics of surficial geologic units present within Sites 1 or 3 that would result in a significant impact or constraint to development. The probability of ~~seismically-induced~~ seismically-induced landslides affecting Sites 1 and 3 is low due to the lack of significant slopes on the Project Sites and surrounding areas, and there are no known landslides at Sites 1 or 3, nor are they in the path of any known or potential landslides.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM CU-1, page 2-32, revise Impact (4.5-2): as follows:

Site 2

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be potential hazards at the Site 2, as discussion above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 2 that would result in a significant impact or constraint to development. It is anticipated that the majority of the fill materials in the eastern region of the Site where the mixed-use structure is proposed to be located would be removed during excavation, exposing adequate alluvial soils or bedrock at the subgrade. The proposed subterranean walls extending below the historically highest groundwater level would be designed for an undrained condition with full hydrostatic pressure. Proposed concrete slabs-on-grade bearing below the historically highest groundwater level would be designed to withstand the hydrostatic uplift pressure for an undrained condition. Furthermore, the probability of ~~seismically-induced~~ seismically-induced landslides affecting Site 2 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 2 nor is Site 2 in the path of any known or potential landslides.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Regulatory Requirement RR NOI-3, page 2-68, revise the regulatory requirement as follows:

RR NOI-3 The ~~project~~ Project shall comply with Section 12.07.11.2 of the County Code (Sites 1 and 3) and Section 91.1207.11.2 (Allowable Interior Noise Levels) of the LAMC (Site 2), which states interior noise levels attributable to exterior sources shall not exceed 45 dbA CNEL in any habitable room.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM NOI-2, page 2-68, revise the mitigation measure as follows:

MM NOI-2 Flexible sound control curtains of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, capable of reducing noise generation by at least 10 dBA shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM NOI-4, page 2-68, revise the mitigation measure as follows:

MM NOI-4 Temporary noise control barriers such as plywood structures shall be erected at the perimeters of the Project Sites as follows: Site 1 – on the northern, eastern and southern edges of the Shatto Place parking structure site on the western edge along Vermont Avenue; and on the southern edge

between Site 1 and Site 2; Site 2 - on the eastern edge of the Site and the southern edge of the Site between the existing County Office building and the edge of the Site, and on the southern edge between Site 1 and Site 2; Site 3 – on the northern, western and southern edges of the Site. The noise control barrier shall consist of K-rail with one-inch plywood fencing on top, of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, at least 8 feet in height, which shall reduce construction-related noise levels at the adjacent uses by at least 10 dBA. Alternatively, sound control curtains at least 8 feet in height and capable of reducing construction-related noise levels at the adjacent uses by at least 10 dBA shall be installed on the identified edges of the Project Sites. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. The temporary barrier shall remain in place until all windows have been installed and all grading and excavation activities on the Project Sites are complete.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM NOI-6, page 2-69, revise the mitigation measure as follows:

MM NOI-6 Two weeks prior to the commencement of construction at the Project Sites, notification shall be provided to the immediate surrounding off-site properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period-, and provides a name, phone number and e-mail address of a point of contact within the construction team who may be contacted to resolve issues related to construction activities that arise during the construction period for the Project.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Regulatory Requirement RR-PS-2, page 2-81, revise the regulatory requirement as follows:

RR-PS-2. The Project Developer shall submit a plot plan for approval of access and hydrants by the County Fire Department for Sites 1 and 3, or LAFD for Site 2, prior to the issuance of building permits. The County Fire Department shall coordinate its findings with respect to Sites 1 and 3 with LAFD. The plot plan shall include fire prevention and access features to the satisfaction of the County or LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- Any required Fire Annunciator panel or Fire Control Room shall be located as required by the Fire Code.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to the Fire Code.
- No building or portion of a building shall be constructed more than 150 feet from the edge of a designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Project Design Feature PDF PS-2, page 2-86, revise the Project Design Feature as follows:

- PDF PS-2** The Project on all three Sites shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:
- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
 - Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
 - Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas;
 - Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
 - Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;
 - Design public spaces to be easily patrolled and accessed by safety personnel;
 - Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
 - Limit visually obstructed and infrequently accessed “dead zones.”

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Project Design Feature PDF TR-1, page 2-98, revise the Project Design Feature as follows:

- PDF TR-1** **Transportation Initiative Funding.** The Developer would make financial contributions to various City transportation initiatives, including the 2010 Bicycle Plan and Vision Zero. These contributions may be used at the City’s discretion to fund infrastructure and safety improvements in and around the Study Area. While the funding of these improvements ~~do~~ does not reduce the significance of transportation impacts on intersections based on City analysis methodology and impact criteria, ~~they do~~ it does help to advance the City’s policies and goals relating to overall mobility for all travel modes.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Regulatory Requirement RR TR-1, page 2-99, revise the Regulatory Requirement as follows:

- RR TR-1:** **Construction Management Plan.** A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan shall be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. In developing the Construction Management Plan, the Project Developer shall contact the LAUSD Transportation Branch and the Principal of Young Oak Kim Academy with regard to school bus and student pedestrian movements during Project construction. The Construction Management Plan shall be based on the nature and timing of the

specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Prohibition of construction worker parking on nearby residential streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Temporary traffic control (e.g., flag men) shall be used during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways.
- Construction activities shall be scheduled to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be utilized as appropriate.
- Workers shall be required to participate in a carpool registry with the goal of reducing single-occupant automobile trips by construction workers.

MM TR-a1

Transportation Demand Management Program. The Project shall develop and implement a TDM program in accordance with the June 29, 2017 LADOT Transportation Study Assessment letter to promote non-auto travel and reduce the use of single-occupant vehicle trips among the office workers on Site 1. The TDM program would be prepared by the County, and approved by the County Department of Public Works. The TDM program would be submitted to the City (LADOT) for verification that the provisions of the TDM program sufficiently justify the 10 percent trip reduction used in the Project's Traffic Study. The County approval and City verification shall be received prior to issuance of certificate of occupancy for the Site 1 County office building. Examples of strategies that may be, but are not required to be included in the TDM program would be the following:

- TDM-related information available in common area
- Bicycle amenities such as racks and showers
- Incentives for using alternative travel modes
- Parking incentives
- Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area

The following provides further information and description of the various TDM program strategies that may be, but are not required to be, incorporated into the Project's TDM program (as determined by LADOT review and approval):

Educational Programs. A transportation management coordinator (TMC) on the building management staff would reach out to employees directly to promote the benefits of TDM.

Project Design Features to Promote Bicycling and Walking. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities, or a bicycle valet system. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians. The Project would also contribute a one-time payment of \$50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the Study Area.

Incentives for Using Alternative Travel Modes. The Project TMC could incorporate various incentives for use of its programs, including discounted transit passes for employees and/or "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at

the Project Site. An additional option could include unbundled parking, which allows for a separate charge for parking from office space and the flexibility to vary the number of spaces rented.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM TR-a2, page 2-102, revise the Project Design Feature as follows:

MM TR-a2 **Transportation Systems Management Improvements.** The ~~Developer~~ Project shall fund and coordinate the installation of a traffic monitoring camera at the intersection of Vermont Avenue & 5th Street and install fiber optic line to connect the camera to LADOT's ATSAC system. The improvement includes installation of high-capacity fiber optic data cables on Vermont Avenue between 5th Street and Beverly Boulevard, a distance of approximately 4,000 feet. The Developer shall implement this improvement through the City's B-Permit process.

Table 2-2, Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures, Mitigation Measure MM TCR-1, page 2-106, revise the mitigation measure as follows:

MM TCR-1 Prior to issuance of a grading permit, the ~~Applicant~~Developer shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading activities within the project site. The Monitor shall photo-document the grading activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determined necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

3.0 PROJECT DESCRIPTION

Section 3.1 INTRODUCTION, page 3-2, 6th paragraph, 2nd sentence, revise as follows:

Site 3 development would be constructed by Meta Housing, the ~~non-profit affordable housing developer~~ member of the TCLA team, on County land, for a public benefit (affordable housing and community recreation center) project.

Section 3.2 ENVIRONMENTAL SETTING, page 3-16, 1st paragraph, revise as follows:

Site 1 is currently developed with a 30,788 square foot, two story office building assigned to DPR that was built in 1959 and housed that is occupied by 93 employees from DPR, and a surface parking lot to the north of this building with 20 spaces, an unoccupied 13,325 square foot one-story office building constructed in 1938, which contains 41 rooftop parking spaces accessed from 6th Street, a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot parking structure (six stories above grade and one story below grade) containing 864 spaces, built in 1958, that connects to the existing County office building and serves all County facilities in the area. ~~Current~~

DPR employees on Site 1 will be relocated to offsite facilities prior to the commencement of construction on Site 1.

Section 3.2 ENVIRONMENTAL SETTING, page 3-16, 3rd paragraph, 1st sentence, revise as follows:

Site 3 is currently developed with a 29,292 square foot, four-story office building assigned to DPR that was built in 1963 and housed-occupied by 112 employees from DPR, and an at-grade parking lot at the rear and north of the existing building containing 65 spaces.

Section 3.2 ENVIRONMENTAL SETTING, page 3-17, 3rd paragraph, 2nd sentence, revise as follows:

Development on Site 3 would consist of (i) a senior affordable housing project¹ to be developed and operated in partnership with ~~a non-profit housing corporation~~ the affordable housing developer member of the TCLA team, and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit.

¹ Senior affordable housing is defined as units for seniors making between 60 percent and 30 percent of the average median income (AMI).

Section 3.3 PROJECT CHARACTERISTICS, page 3-18, 2nd paragraph, 2nd sentence, revise as follows:

~~Current~~ DPR employees located on Site 1 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 1.

Section 3.3 PROJECT CHARACTERISTICS, page 3-26, 1st paragraph, 2nd sentence, revise as follows:

~~Current~~ DPR employees located on Site 3 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 3.

Section 3.3 PROJECT CHARACTERISTICS, page 3-19, Table 3-2, line 4, revise as follows:

County Office (~~Occupied~~)

Section 3.3 PROJECT CHARACTERISTICS, page 3-19, Table 3-2, line 28, revise as follows:

County Office (~~Occupied~~)

4.4 ENERGY

Section 4.4 Energy, page 4.4-16, revise the paragraph as follows:

Natural Gas

The Project would increase the demand for natural gas resources. The estimated projected ~~electrical loads~~ natural gas demand are provided in Table 4.4-4 (Estimated Proposed Natural Gas Demand), below.

4.5 GEOLOGY AND SOILS

Section 4.5 Geology and Soils, page 4.5-3 revise the paragraph as follows:

The probability of ~~seismically induced~~ seismically-induced landslides affecting the Project Sites is low due to the lack of significant slopes on the site and surrounding areas. Moreover, the Project Sites are not in an area identified as having a potential for seismic slope instability. The Project Sites are not included in

an area of “Landslide Inventory and Hillside Areas” and there are no known landslides at the Project Sites, nor are the Project Sites in the path of any known or potential landslides.¹

Section 4.5 Geology and Soils, page 4.5-15 revise the paragraph as follows:

Site 1

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 1, as discussed above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 1 that would result in a significant impact or constraint to development. The probability of ~~seismically-induced~~ seismically-induced landslides affecting Site 1 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 1, nor is Site 1 in the path of any known or potential landslides.

Section 4.5 Geology and Soils, pages 4.5-15 through 4.5-16 revise the paragraph as follows:

Site 2

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 2, as discussion above. Moreover, there are no known physical characteristics of surficial geologic units present at Site 2 that would result in a significant impact or constraint to development. It is anticipated that the majority of the fill materials in the eastern portion of the Site where the mixed-use structure is proposed to be located would be removed during excavation, exposing adequate alluvial soils or bedrock at the subgrade. The proposed subterranean walls extending below the historically highest groundwater level would be designed for an undrained condition with full hydrostatic pressure. Proposed concrete slabs-on-grade bearing below the historically highest groundwater level would be designed to withstand the hydrostatic uplift pressure for an undrained condition. Furthermore, the probability of ~~seismically-induced~~ seismically-induced landslides affecting Site 2 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 2 nor is Site 2 in the path of any known or potential landslides.

Section 4.5 Geology and Soils, page 4.5-16 revise the paragraph as follows:

Site 3

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 3, as discussion above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 3 that would result in a significant impact or constraint to development. In order to withstand the hydrostatic uplift imposed by the historically highest groundwater level, it is anticipated that the structure would have to be supported on a mat foundation at the lowest finished floor elevation. Subterranean walls to be located above the historically highest groundwater level may be designed for a drained condition, provided that a retaining wall subdrain would be installed. Furthermore, the probability of ~~seismically-induced~~ seismically-induced landslides affecting Site 3 is low due to the lack of significant slopes on the

¹ *City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, June 1994.*

site and surrounding areas, and there are no known landslides at Site 3, nor is Site 3 in the path of any known or potential landslides.

4.9 LAND USE AND PLANNING

Section 4.9 Land Use and Planning, page 4.9-29, revise the paragraph as follows:

Site 2 would connect to the existing sewer lines located underground within the public right-of-way on Vermont Avenue and 6th Gower Street. Storm drains would either discharge through the curb face via a parkway drain, located underneath the sidewalk, or be hard-piped to a catch basin, which would be also located underneath the public sidewalk. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to utilities.

4.10 NOISE

Section 4.10 Noise, page 4.10-26, revise the paragraph as follows:

Construction activity on Sites 1 and 2 would not generate vibration levels that exceed the 72 dBA FTA threshold used by the City to represent vibration levels that could cause human annoyance (Draft EIR, pages 4.10-9 and 4.10-10). Humans could perceive vibration generated during construction at the sensitive receptors located in the vicinity of Site 3 where the vibration level would exceed the threshold identified by the FTA and used by the City. However, vibration levels experienced would be temporary and intermittent, and would be reduced when the construction activities are located toward the center of ~~the Site 3~~ each of the Project Sites, further away from the sensitive receptor locations. Furthermore, consistent with the requirements of LAMC Section 41.40 of the LAMC, construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, would be prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays. As such, impacts with respect to construction vibration related to human perception would be less than significant.

Section 4.10 Noise, page 4.10-35, revise the mitigation measure as follows:

MM NOI-2: Flexible sound control curtains of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC 20, capable of reducing noise generation by at least 10 dBA shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

Section 4.10 Noise, page 4.10-35, revise the mitigation measure as follows:

MM NOI-4: Temporary noise control barriers such as plywood structures shall be erected at the perimeters of the Project Sites as follows: Site 1 – on the northern, eastern and southern edges of the Shatto Place parking structure site on the western edge along Vermont Avenue; and on the southern edge between Site 1 and Site 2; Site 2 - on the eastern edge of the Site and the southern edge of the Site between the existing County Office building and the edge of the Site, and on the southern edge between Site 1 and Site 2; Site 3 – on the northern, western and southern edges of the Site. The noise control barrier shall consist of K-rail with one-inch plywood fencing on top, of sufficient height to break the line of sight to an affected receptor, with Sound Transmission Class rating of at least STC

20, at least 8 feet in height, which shall reduce construction-related noise levels at the adjacent uses by at least 10 dBA. Alternatively, sound control curtains at least 8 feet in height and capable of reducing construction-related noise levels at the adjacent uses by at least 10 dBA shall be installed on the identified edges of the Project Sites. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. The temporary barrier shall remain in place until all windows have been installed and all grading and excavation activities on the Project Sites are complete.

Section 4.10 Noise, page 4.10-35, revise the mitigation measure as follows:

MM NOI-6: Two weeks prior to the commencement of construction at the Project Sites, notification shall be provided to the immediate surrounding off-site properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period-, and provides a name, phone number and e-mail address of a point of contact within the construction team who may be contacted to resolve issues related to construction activities that arise during the construction period for the Project.

4.11 POPULATION, HOUSING, AND EMPLOYMENT

Section 4.11 Population, Housing, and Employment, page 4.11-2, add the following after the 2nd full paragraph:

SB 35

On January 1, 2018, Senate Bill 35 (SB 35) became effective, which streamlines the approval process for multi-family residential projects that include affordable housing in many urbanized cities and counties. SB 35 was part of a large package of bills passed by the Legislature in 2017 that seeks to incentivize the construction of affordable housing throughout the state. SB 35 provides consequences for cities and counties in urbanized or partially-urbanized areas that fail to meet their Regional Housing Needs Assessment (RHNA, see discussion below) goals. If a city or county does not issue sufficient building permits to meet its RHNA goals, multi-family residential projects that would contribute to meeting those RHNA goals would receive a streamlined review. The streamlined review SB 35 would provide is limited to projects that meet specified criteria, including affordability, location, and environmental factors, and for projects with more than 10 units, prevailing wage requirements.

Section 4.11 Population, Housing, and Employment, page 4.11-7, add the following after the 3rd full paragraph:

Under SB 35, the State Department of Housing and Community Development (“HCD”) is required to report on which jurisdictions throughout the state are meeting their RHNA goals and which are not. On January 31, 2018, HCD issued the first “SB 35 Statewide Determination Summary” (see Appendix B to this FEIR). The HCD report indicates that the City of Los Angeles met its goal for Above-Moderate income units, but did not meet the goal for Very Low and Low Income units. The County of Los Angeles did not meet any of its RHNA goals.

Section 4.11 Population, Housing, and Employment, page 4.11-11, revise the paragraph as follows:

As shown in Table 4.11-3, Site 1 would generate approximately 2,166 County office employees and 27 retail employees at full occupancy in 2023, which would result in a net increase of approximately 2,100 employees on the Site. According to SCAG data, the City of Los Angeles subregion had a total population of ~~33,845,500~~ 3,845,500 persons in 2012. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 171,500 between 2012 and 2020, and by 592,400 persons between 2020 and 2040. The addition of these new residents would be within the SCAG growth projection, representing approximately 1.22 percent of the Citywide total growth for the period of 2012 to 2020, and approximately 0.35 percent of the Citywide total growth for the period of 2020 to 2040. As discussed above, most of the expected employees on Site 1 would be drawn from the existing County labor force and would not need to relocate, or have associated demand for new housing in the area. It is possible that some of the future employees (of which only 103 are anticipated and could be accommodated) would be permanent residents to the area; however, it is unlikely that this indirect population growth would be substantial in the context of the growth forecast for the City of Los Angeles. Estimates extrapolated/taken from SCAG data projects the Citywide housing supply to increase by 115,900 units between 2012 and 2020, and by 248,900 units between 2020 and 2040 and the proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet for the construction of 172 units by 2023. Thus, the Project's potential to induce growth from the increase in employees on Site 1 is not considered to be significant due to the readily available local labor force and the existing and forthcoming housing stock available within the area. Therefore, impacts related to population growth on Site 1 would be less than significant.

Section 4.11 Population, Housing, and Employment, page 4.11-12, 3rd paragraph, add the following after the 3rd sentence:

In addition, housing development on Site 2 would meet the housing affordability requirements of the City that are in effect at the time the residential project on Site 2 is approved, which would support the City's efforts to meet its RHNA goals for affordable housing units.

Section 4.11 Population, Housing, and Employment, page 4.11-14, 3rd full paragraph, add the following after the 3rd sentence:

In addition, the senior affordable housing project on Site 3 would support the City's efforts to meet its RHNA goals for affordable housing units.

4.12 PUBLIC SERVICES

Section 4.12 Public Services, page 4.12-22, revise the paragraph as follows:

Officer-to-Population Ratio

Implementation of the development on Site 2 would result in an increase of residents and site visitors within the Site, thereby potentially generating a potential increase in the number of service calls from Site 2. Site 2 development involves the construction of a variety of uses including 246 residential units. As discussed in Section 4.11 (Population, Housing, and Employment) of this EIR, the Project would be expected to generate 618 new residents and operation of the Project would generate approximately 30 new employees on Site 2. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 618 new residents on Site 2 could create the demand for additional officers. With the addition of Site 2's residential population, the resident/officer ratio in the West Bureau would be diminished. Specifically, the Project would increase the existing service population from 200,000 persons to 200,618 (200,000 +

618) persons. The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 854 residents ($\frac{200,643}{200,618} \div 235$ officers = 854). This is only a slight increase and therefore, the development on Site 2 would not represent a significant change in the officer-per-resident ratio of the service area.

Section 4.12 Public Services, page 4.12-25, revise the paragraph as follows:

In addition to the capabilities of the Olympic Station to serve the Project Sites and surrounding areas, including the related projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership and, thus, the Project, in combination with growth in demand for police protection services would not require the addition of a new police station or expansion, or consolidation or relocation of an existing facility to maintain service. Further, the Project impact analysis determined the impact on police protection would be less than significant and not result in the need for expanded, consolidated, or relocated police facilities; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to police protection would be less than significant.

Section 4.12 Public Services, page 4.12-26, revise the Project Design Feature as follows:

PDF PS-2: The Project on all three Sites shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;

- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

Section 4.12 Public Services, page 4.12-33, revise the paragraph as follows:

Site 2

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction of Site 2 would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the north side of 6th Street. Construction staging and construction-related parking would primarily be confined to Site 2 and would not significantly interfere with school traffic.

4.14 TRANSPORTATION AND TRAFFIC

Section 4.14 Transportation and Traffic, pages 4.14-31 through 4.14-32, revise the paragraph as follows:

Project Trip Distribution

The geographic distribution of traffic to and from the Project Sites is based on locations where office employees live and where residents at the Project Sites may be employed. Trips associated with the ground floor commercial space at Sites 1 and 2 are assumed to follow the same distribution pattern as the office or residential trips that make up the heavy majority of each Site’s trip generation. Trips to and from the community recreation center proposed at Site 3 are also assumed to follow the residential trip distribution pattern.

Section 4.14 Transportation and Traffic, page 4.14-53, revise the paragraph as follows:

Public Transit System

The CMP requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system.

The CMP prescribes a methodology for estimating the number of transit trips to be generated by a development Project. First, the Project’s trip generation is converted to person-trips by multiplying by a factor of 1.4 persons per vehicle. Second, for a primarily commercial project within 1/4-mile of a transit center (including the Wilshire / Vermont station of the Metro Red Line), 15 percent of the person-trips are assumed to be made by transit. Table 48 of the Traffic Study (Appendix 4.14-1) summarizes this calculation based on the vehicle trip generation estimates in Table 13 of the Traffic Study (Appendix 4.14-1). As shown, the Project would generate approximately 67 transit person-trips during the morning peak hour and 87 transit person-trips during the afternoon peak hour.

Section 4.14 Transportation and Traffic, page 4.14-59, revise Project Design Feature as follows:

PDF TR-1: Transportation Initiative Funding. The Developer would make financial contributions to various City transportation initiatives, including the 2010 Bicycle Plan and Vision Zero. These contributions may be used at the City’s discretion to fund infrastructure and safety

improvements in and around the Study Area. While the funding of these improvements ~~do~~ does not reduce the significance of transportation impacts on intersections based on City analysis methodology and impact criteria, it does ~~they do~~ help to advance the City's policies and goals relating to overall mobility for all travel modes.

Section 4.14 Transportation and Traffic, page 4.14-60, revise the regulatory requirement as follows:

RR TR-1: Construction Management Plan. A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan shall be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. In developing the Construction Management Plan, the Project Developer shall contact the LAUSD Transportation Branch and the Principal of Young Oak Kim Academy with regard to school bus and student pedestrian movements during Project construction. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Prohibition of construction worker parking on nearby residential streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Temporary traffic control (e.g., flag men) shall be used during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways.
- Construction activities shall be scheduled to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be utilized as appropriate.
- Workers shall be required to participate in a carpool registry with the goal of reducing single-occupant automobile trips by construction workers.

Section 4.14 Transportation and Traffic, page 4.14-61, revise the mitigation measure as follows:

MM TR-a1 Transportation Demand Management Program. The Project shall develop and implement a TDM program in accordance with the June 29, 2017 LADOT Transportation Study Assessment letter to promote non-auto travel and reduce the use of single-occupant vehicle trips among the office workers on Site 1. The TDM program would be prepared by the County, and approved by the County Department of Public Works. The TDM program would be submitted to the City (LADOT) for verification that the provisions of the TDM program sufficiently justify the 10 percent trip reduction used in the Project's Traffic Study. The County approval and City verification shall be received prior to issuance of certificate of occupancy for the Site 1 County office building. Examples of strategies that may be, but are not required to be included in the TDM program would be the following:

- TDM-related information available in common area

- Bicycle amenities such as racks and showers
- Incentives for using alternative travel modes
- Parking incentives
- Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area

The following provides further information and description of the various TDM program strategies that may be, but are not required to be, incorporated into the Project's TDM program (as determined by LADOT review and approval):

Educational Programs. A transportation management coordinator (TMC) on the building management staff would reach out to employees directly to promote the benefits of TDM.

Project Design Features to Promote Bicycling and Walking. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities, or a bicycle valet system. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians. The Project would also contribute a one-time payment of \$50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the Study Area.

Incentives for Using Alternative Travel Modes. The Project TMC could incorporate various incentives for use of its programs, including discounted transit passes for employees and/or "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site. An additional option could include unbundled parking, which allows for a separate charge for parking from office space and the flexibility to vary the number of spaces rented.

4.15 TRIBAL CULTURAL RESOURCES

Section 4.15 Tribal Cultural Resources, pages 4.15-9 through 4.15-10, revise the mitigation measure as follows:

- MM TCR-1:** Prior to issuance of a grading permit, the ~~Applicant~~Developer shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading activities within the project site. The Monitor shall photo-document the grading activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determined necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare

and submit a final report to the County and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

4.16 UTILITIES AND SERVICE SYSTEMS

Section 4.16 Utilities and Service Systems, pages 4.16-10 through 4.16-11, revise the paragraph as follows:

ENVIRONMENTAL SETTING

Existing Conditions

Water Supply

The City of Los Angeles Department of Water and Power (“LADWP”) is responsible for providing water supply to the City while complying with County, State, and Federal regulations. According to the *2015 Urban Water Management Plan*, discussed below, the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District, surface water imported via the Los Angeles Aqueduct, and local groundwater. Recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet LADWP’s water supply needs. The *2015 Urban Water Management Plan* water demand projection for 2040 is approximately ~~709,500~~ 675,700 acre-feet per year, based on normal weather conditions.²

Section 4.16 Utilities and Service Systems, page 4.16-18 revise the paragraph as follows:

On October 14, 2014, the Mayor of Los Angeles issued Executive Directive 5: Emergency Drought Response (ED5) for the City to achieve a 20 percent per capita reduction in potable water use by FYE 2017; a reduction in LADWP purchase of imported water by 50 percent by FYE 2024; and creation of an integrated strategy that increases local water supplies and improves water security in the context of climate change and seismic vulnerability.

Section 4.16 Utilities and Service Systems, page 4.16-24 revise the paragraph as follows:

The 2015 Urban Water Management Plan has estimated a water demand of 475 mgd by the year 2025, which means the Project combined with the related projects would account for approximately 0.63 percent of the total daily demand.

Based on the above, it is anticipated that LADWP would be able to supply the demands of the Project and future growth through the year 2040. However, per LADWP, the adequacy of water supply is not based on an incremental increase in the Project’s water consumption. Each of the cumulative projects is required to be consistent with the Southern California Association of Governments Regional Transportation Plan projects in order to be accounted for in LADWP’s UWMP current and projected available water demand. Should related project be accounted for in LADWP’s UWMP, no significant cumulative water supply impact is anticipated from development of the Project and the cumulative projects. Therefore, cumulative impacts on water supply would be less than significant.

² *Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page ES-22 23.*

6.0 OTHER CEQA CONSIDERATIONS

6.5. EFFECTS NOT FOUND TO BE SIGNIFICANT

Section Geology and Soils, page 6.5-5 revise the paragraph as follows:

All aspects of seismic-related hazards, other geotechnical hazards, and erosion and sedimentation issues are regulated by Los Angeles County and/or the State of California. Development at the Project Sites would incorporate the recommendations of the geotechnical assessments as a ~~Project Design Features regulatory requirement (RR GS-3).~~ In addition, adherence to design and construction standards, as required by State and County regulations and codes, would ensure maximum practicable protection for users of the buildings such that they can withstand acceptable risk.

Section Hazards and Hazardous Materials, page 6.5-7 revise the paragraph as follows:

The Project Sites are not located along a County-identified disaster route.³ The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way.⁴ No full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded.⁵ Access for emergency service providers and evacuation routes would be maintained during construction. Furthermore, during Project construction, the Project Applicant would be required to prepare a Traffic/Construction Management Plan (Regulatory Requirement RR TR-1), which would involve close coordination with applicable agencies, including, but not limited to, the City of Los Angeles Department of Transportation, Fire Department, and Police Department, to ensure that emergency response or evacuation is not interrupted or affected by the Project during construction or operation. Therefore, the Project would not be expected to impact emergency response or emergency evacuation plans.

³ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area*, website: <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: March 20, 2017.

⁴ *Transportation Study for the Vermont Corridor Development Plan*, Gibson Transportation Consulting, June, 2017. See Appendix 4.14-1 to this Draft EIR.

⁵ *Ibid.*

VERMONT CORRIDOR PROJECT

Final Environmental Impact Report

Appendices

State Clearinghouse No. 2017051013

Lead Agency:

County of Los Angeles

c/o Community Development Commission

County of Los Angeles

700 West Main Street

Alhambra, CA 91801

May, 2018

A

DMH Employee Travel Survey 2016

DMH LOC	REC ID#	monmode	tuemode	wedmode	thumode	frimode
550 S Vermont	1	C	C	C	C	C
550 S Vermont	2	J	J	J	J	J
550 S Vermont	3	J	J	J	J	J
550 S Vermont	4	B	B	B	B	B
550 S Vermont	5	J	J	J	J	J
550 S Vermont	6	C	C	C	C	Z
550 S Vermont	7	C	C	C	C	Z
550 S Vermont	8	O	O	O	O	O
550 S Vermont	9	Z	AA	C	C	C
550 S Vermont	10	Z	K	K	K	K
550 S Vermont	11	J	J	J	J	C
550 S Vermont	12	Z	J	J	H	J
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550 S Vermont	26	AA	AA	AA	AA	Y
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550 S Vermont	37	Z	K	K	J	BB
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550 S Vermont	242 H	H	H	H	H
550 S Vermont	243 C	C	C	C	Z
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550 S Vermont	246 C	C	C	C	C
550 S Vermont	247 H	H	H	H	H
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550 S Vermont	249 H	H	H	H	Z
550 S Vermont	250 H	H	H	H	H
550 S Vermont	251 H	H	H	H	H
550 S Vermont	252 C	C	C	C	C
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550 S Vermont	254 H	H	H	H	H
550 S Vermont	255 H	H	H	H	H
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550 S Vermont	257 H	H	H	H	H
550 S Vermont	258 H	H	H	H	H
550 S Vermont	259 H	H	H	H	H
550 S Vermont	260 H	H	H	H	H
550 S Vermont	261 C	C	C	C	Z
550 S Vermont	262 B	B	B	B	Z
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550 S Vermont	264 C	C	C	C	C
550 S Vermont	265 B	B	B	B	C
550 S Vermont	266 D	D	D	D	Z
550 S Vermont	267 B	B	B	B	B
550 S Vermont	268 J	J	J	J	J
550 S Vermont	269 C	C	C	C	CC
550 S Vermont	270 C	C	C	C	C
550 S Vermont	271 AA	H	C	C	Z
550 S Vermont	272 B	B	B	B	Z
550 S Vermont	273 B	B	B	B	B
550 S Vermont	274 C	C	C	C	Z
550 S Vermont	275 C	C	C	C	C
550 S Vermont	276 B	B	B	B	B
550 S Vermont	277 CC	H	CC	CC	H
550 S Vermont	278 C	C	C	C	AA
550 S Vermont	279 C	C	C	C	C
550 S Vermont	280 C	C	C	C	Z
550 S Vermont	281 B	B	B	B	B

550 S Vermont	282 J	J	J	J	J
550 S Vermont	283 C	C	C	C	C
550 S Vermont	284 K	K	K	K	K
550 S Vermont	285 C	C	C	C	C
550 S Vermont	286 C	C	C	C	C
550 S Vermont	287 Z	C	C	C	C
550 S Vermont	288 J	J	J	J	J
550 S Vermont	289 B	B	B	B	B
550 S Vermont	290 C	C	C	C	C
550 S Vermont	291 C	C	C	C	C
550 S Vermont	292 AA	AA	C	C	C
550 S Vermont	293 C	C	C	C	C
550 S Vermont	294 C	C	C	C	C
550 S Vermont	295 O	J	M	H	Z
550 S Vermont	296 C	C	CC	C	C
550 S Vermont	297 B	B	B	B	B
550 S Vermont	298 K	K	K	K	K
550 S Vermont	299 C	C	C	C	Z
550 S Vermont	300 C	C	C	C	C
550 S Vermont	301 I	I	BB	BB	Z
550 S Vermont	302 C	C	C	C	Z
550 S Vermont	303 CC	B	B	B	B
550 S Vermont	304 AA	A	J	J	Z
550 S Vermont	305 B	B	B	B	B
550 S Vermont	306 B	B	BB	B	B
550 S Vermont	307 B	B	BB	B	B
550 S Vermont	308 J	J	J	BB	J
550 S Vermont	309 J	J	J	J	J
550 S Vermont	310 J	K	J	J	Z
550 S Vermont	311 J	J	J	J	H
550 S Vermont	312 B	B	C	C	Z
550 S Vermont	313 C	C	C	C	C
550 S Vermont	314 B	B	B	B	Z
550 S Vermont	315 B	B	B	B	Z
550 S Vermont	316 C	C	C	C	C
550 S Vermont	317 B	B	C	C	B
550 S Vermont	318 B	B	B	B	B
550 S Vermont	319 B	B	B	B	H
550 S Vermont	320 H	H	H	H	H
550 S Vermont	321 H	H	H	H	H
550 S Vermont	322 H	H	H	H	H
550 S Vermont	323 B	B	B	B	B
550 S Vermont	324 H	H	H	H	H
550 S Vermont	325 B	B	B	B	Z
550 S Vermont	326 B	B	B	B	Z
550 S Vermont	327 H	H	H	H	H
550 S Vermont	328 B	B	B	B	Z

550 S Vermont	329 B	B	B	B	B
550 S Vermont	330 H	H	BB	H	Z
550 S Vermont	331 H	H	H	H	H
550 S Vermont	332 B	B	B	B	B
550 S Vermont	333 B	B	B	B	Z
550 S Vermont	334 H	H	H	H	H
550 S Vermont	335 B	B	B	B	B
550 S Vermont	336 C	C	C	C	Z
550 S Vermont	337 H	H	H	H	H
550 S Vermont	338 C	C	C	C	C
550 S Vermont	339 B	B	B	B	Z
550 S Vermont	340 B	B	B	B	B
550 S Vermont	341 H	H	H	H	H
550 S Vermont	342 B	B	B	B	B
550 S Vermont	343 C	C	C	C	C
550 S Vermont	344 H	H	H	H	H
550 S Vermont	345 B	B	B	B	B
550 S Vermont	346 B	B	B	B	Z
550 S Vermont	347 H	H	H	H	Z
550 S Vermont	348 H	H	H	H	H
550 S Vermont	349 H	H	H	H	H
550 S Vermont	350 BB	J	J	J	J
550 S Vermont	351 B	B	B	B	Z
550 S Vermont	352 B	B	B	B	B
550 S Vermont	353 H	H	H	H	CC
550 S Vermont	354 C	C	C	C	C
550 S Vermont	355 J	J	J	J	J
550 S Vermont	356 B	B	B	B	Z
550 S Vermont	357 H	H	H	H	H
550 S Vermont	358 H	H	H	H	H
550 S Vermont	359 B	B	B	B	Z
550 S Vermont	360 H	H	H	H	H
550 S Vermont	361 B	B	B	B	Z
550 S Vermont	362 H	I	H	H	H
550 S Vermont	363 H	H	H	H	H
550 S Vermont	364 BB	BB	H	C	H
550 S Vermont	365 H	H	H	H	H
550 S Vermont	366 H	B	B	H	B
550 S Vermont	367 H	H	H	H	H
550 S Vermont	368 H	H	H	H	H
550 S Vermont	369 H	H	H	H	H
550 S Vermont	370 H	H	H	H	H
550 S Vermont	371 H	H	H	H	H
550 S Vermont	372 H	H	H	H	H
550 S Vermont	373 H	H	H	H	H
550 S Vermont	374 H	H	H	H	H
550 S Vermont	375 H	H	AA	H	H

550 S Vermont	376 BB	H	H	H	Z
550 S Vermont	377 H	H	H	H	H
550 S Vermont	378 H	H	H	H	Z
550 S Vermont	379 H	H	H	H	Z
550 S Vermont	380 H	H	H	H	AA
550 S Vermont	381 H	H	H	AA	AA
550 S Vermont	382 BB	H	H	H	H
550 S Vermont	383 H	H	H	H	H
550 S Vermont	384 H	H	H	H	H
550 S Vermont	385 H	H	H	H	H
550 S Vermont	386 H	H	H	H	H
550 S Vermont	387 H	H	H	H	H
550 S Vermont	388 H	H	H	H	Z
550 S Vermont	389 H	H	H	H	Z
550 S Vermont	390 Z	H	H	H	H
550 S Vermont	391 H	H	H	H	H
550 S Vermont	392 H	H	H	H	H
550 S Vermont	393 H	H	H	H	Z
550 S Vermont	394 H	H	H	H	H
550 S Vermont	395 H	H	H	H	H
550 S Vermont	396 H	H	H	H	H
550 S Vermont	397 H	H	H	H	H
550 S Vermont	398 H	H	H	H	H
550 S Vermont	399 H	H	H	H	H
550 S Vermont	400 H	H	H	H	E
550 S Vermont	401 H	H	H	H	H
550 S Vermont	402 H	H	H	H	H
550 S Vermont	403 C	C	C	C	C
550 S Vermont	404 H	H	H	H	H
550 S Vermont	405 H	H	BB	H	BB
550 S Vermont	406 H	H	H	H	H
550 S Vermont	407 C	C	C	C	C
550 S Vermont	408 J	J	J	J	Z
550 S Vermont	409 AA	C	C	C	H
550 S Vermont	410 C	C	C	C	C
550 S Vermont	411 J	J	J	J	J
550 S Vermont	412 C	C	C	C	C
550 S Vermont	413 Y	H	H	H	H
550 S Vermont	414 BB	BB	BB	BB	Y
550 S Vermont	415 J	H	J	H	Y
550 S Vermont	416 Y	H	J	H	H
550 S Vermont	417 Z	H	H	H	H
550 S Vermont	418 H	H	H	H	Z
550 S Vermont	419 H	H	H	H	Y
550 S Vermont	420 H	H	H	H	Z
550 S Vermont	421 H	H	H	H	H
550 S Vermont	422 H	H	AA	H	Z

550 S Vermont	423 H	H	H	H	Z
550 S Vermont	424 Y	H	H	H	H
550 S Vermont	425 Y	H	J	H	H
550 S Vermont	426 H	B	AA	AA	Y
550 S Vermont	427 Y	AA	AA	H	H
550 S Vermont	428 H	J	H	H	Y
550 S Vermont	429 H	H	H	H	I
550 S Vermont	430 Y	H	H	H	H
550 S Vermont	431 Y	H	H	H	H
550 S Vermont	432 H	H	J	J	Z
550 S Vermont	433 H	H	Y	H	H
550 S Vermont	434 Y	H	H	H	H
550 S Vermont	435 C	C	H	H	Z
550 S Vermont	436 H	H	H	H	Y
550 S Vermont	437 O	H	H	H	Z
550 S Vermont	438 Y	H	H	H	H
550 S Vermont	439 H	H	H	H	Y
550 S Vermont	440 J	J	J	J	J
550 S Vermont	441 C	C	C	C	Z
550 S Vermont	442 K	K	K	K	K
550 S Vermont	443 H	H	H	H	H
550 S Vermont	444 Z	H	H	H	H
550 S Vermont	445 H	H	H	H	H
550 S Vermont	446 Z	H	H	H	H
550 S Vermont	447 Z	J	J	J	J
550 S Vermont	448 H	H	H	H	H
550 S Vermont	449 H	H	H	H	H
550 S Vermont	450 Z	AA	AA	AA	AA
550 S Vermont	451 H	H	H	H	H
550 S Vermont	452 H	H	H	H	Z
550 S Vermont	453 H	H	H	H	H
550 S Vermont	454 H	H	H	H	H
550 S Vermont	455 H	H	H	H	H
550 S Vermont	456 H	H	H	H	H
550 S Vermont	457 BB	BB	BB	H	H
550 S Vermont	458 H	H	BB	H	H
550 S Vermont	459 H	H	H	H	H
550 S Vermont	460 H	H	H	H	H
550 S Vermont	461 H	H	H	H	H
550 S Vermont	462 H	H	H	H	H
550 S Vermont	463 H	H	H	H	H
550 S Vermont	464 AA	AA	H	BB	H
550 S Vermont	465 H	H	H	H	CC
550 S Vermont	466 H	H	H	H	H
550 S Vermont	467 H	H	H	H	H
550 S Vermont	468 H	H	H	H	H
550 S Vermont	469 H	H	H	H	H

550 S Vermont	470 H	H	H	H	Z
550 S Vermont	471 H	H	H	H	Z
550 S Vermont	472 H	H	H	H	H
550 S Vermont	473 H	H	H	H	H
550 S Vermont	474 K	K	H	H	AA
550 S Vermont	475 Z	B	H	H	H
550 S Vermont	476 H	H	H	H	H
550 S Vermont	477 H	H	H	H	H
550 S Vermont	478 Z	AA	AA	AA	O
550 S Vermont	479 H	H	H	H	H
550 S Vermont	480 H	H	H	AA	Z
550 S Vermont	481 H	H	H	H	H
550 S Vermont	482 H	H	H	H	Z
550 S Vermont	483 H	H	H	H	Z
550 S Vermont	484 H	H	H	H	H
550 S Vermont	485 H	H	H	H	H
550 S Vermont	486 H	H	H	H	H
550 S Vermont	487 H	H	H	H	H
550 S Vermont	488 H	H	AA	H	H
550 S Vermont	489 Z	H	H	H	H
550 S Vermont	490 H	CC	CC	H	H
550 S Vermont	491 H	H	H	H	H
550 S Vermont	492 H	C	C	H	BB
550 S Vermont	493 H	H	H	H	Z
550 S Vermont	494 H	BB	H	H	H
550 S Vermont	495 H	H	H	H	H
550 S Vermont	496 H	H	H	H	Z
550 S Vermont	497 H	H	H	H	H
550 S Vermont	498 H	H	H	H	Z
550 S Vermont	499 H	H	H	H	H
550 S Vermont	500 H	H	H	H	Z
550 S Vermont	501 H	H	H	H	H
550 S Vermont	502 H	H	H	H	Z
550 S Vermont	503 H	H	H	H	H
550 S Vermont	504 H	H	H	H	H
550 S Vermont	505 H	H	H	H	Z
550 S Vermont	506 H	H	H	H	H
550 S Vermont	507 H	H	H	H	Z
550 S Vermont	508 H	H	BB	BB	H
550 S Vermont	509 H	H	H	H	H
550 S Vermont	510 H	H	H	H	H
550 S Vermont	511 H	H	H	H	H
550 S Vermont	512 H	H	H	H	H
550 S Vermont	513 AA	AA	AA	AA	Z
550 S Vermont	514 H	H	H	H	Z
550 S Vermont	515 H	H	H	H	Z
550 S Vermont	516 H	H	H	H	Z

550 S Vermont	517 H	H	H	H	Z
550 S Vermont	518 H	H	H	H	Z
550 S Vermont	519 H	H	H	H	Z
550 S Vermont	520 H	H	H	H	Z
550 S Vermont	521 H	H	H	J	H
550 S Vermont	522 H	H	H	H	Z
550 S Vermont	523 H	H	H	H	Z
550 S Vermont	524 H	H	H	H	Z
550 S Vermont	525 H	H	H	H	Z
550 S Vermont	526 H	H	H	H	Z
550 S Vermont	527 H	H	H	H	Z
550 S Vermont	528 H	H	H	H	Z
550 S Vermont	529 H	H	H	H	Z
550 S Vermont	530 H	H	H	H	H
550 S Vermont	531 H	H	J	AA	Z
550 S Vermont	532 H	H	H	H	Z
550 S Vermont	533 H	H	H	H	H
550 S Vermont	534 H	H	H	H	H
550 S Vermont	535 H	H	H	H	H
550 S Vermont	536 AA	AA	AA	H	H
550 S Vermont	537 BB	H	H	H	H
550 S Vermont	538 H	H	H	H	H
550 S Vermont	539 H	H	H	H	H
550 S Vermont	540 H	H	H	H	H
550 S Vermont	541 H	H	H	H	Z
550 S Vermont	542 H	H	H	H	H
550 S Vermont	543 H	H	H	H	H
550 S Vermont	544 H	H	H	H	H
550 S Vermont	545 H	H	H	H	H
550 S Vermont	546 H	H	H	H	H
550 S Vermont	547 H	H	H	H	H
550 S Vermont	548 H	H	H	H	H
550 S Vermont	549 H	H	H	H	H
550 S Vermont	550 H	H	H	H	H
550 S Vermont	551 AA	H	H	H	H
550 S Vermont	552 H	H	H	H	H
550 S Vermont	553 H	H	H	H	BB
550 S Vermont	554 H	H	H	H	H
550 S Vermont	555 H	H	H	H	H
550 S Vermont	556 H	H	H	H	H
550 S Vermont	557 AA	AA	H	H	H
550 S Vermont	558 H	H	H	H	H
550 S Vermont	559 Z	H	H	H	J
550 S Vermont	560 H	H	H	H	Z
550 S Vermont	561 H	H	H	H	H
550 S Vermont	562 H	H	H	H	H
550 S Vermont	563 H	H	H	H	H

550 S Vermont	564 H	H	H	H	H
550 S Vermont	565 H	H	H	H	H
550 S Vermont	566 H	H	H	H	H
550 S Vermont	567 H	H	H	H	H
550 S Vermont	568 H	H	H	H	H
550 S Vermont	569 H	H	H	H	H
550 S Vermont	570 BB	H	H	H	H
550 S Vermont	571 H	H	H	H	H
550 S Vermont	572 H	H	H	H	H
550 S Vermont	573 H	H	H	H	H
550 S Vermont	574 H	H	H	H	H
550 S Vermont	575 H	H	H	H	AA
550 S Vermont	576 H	BB	H	BB	H
550 S Vermont	577 H	H	H	H	H
550 S Vermont	578 H	H	H	H	H
550 S Vermont	579 H	H	H	H	H
550 S Vermont	580 H	H	H	H	H
550 S Vermont	581 H	H	H	H	H
550 S Vermont	582 B	B	B	B	B
550 S Vermont	583 H	H	H	H	H
550 S Vermont	584 H	H	H	H	H
550 S Vermont	585 H	H	H	H	H
550 S Vermont	586 H	H	H	H	H
550 S Vermont	587 H	H	H	H	H
550 S Vermont	588 H	H	H	H	H
550 S Vermont	589 H	H	H	H	H
550 S Vermont	590 Z	H	H	H	H
550 S Vermont	591 H	H	BB	H	H
550 S Vermont	592 H	H	H	H	AA
550 S Vermont	593 H	H	H	H	H
550 S Vermont	594 H	BB	H	H	H
550 S Vermont	595 H	H	AA	AA	H
550 S Vermont	596 H	H	H	H	H
550 S Vermont	597 H	H	H	H	Z
550 S Vermont	598 H	H	B	B	B
550 S Vermont	599 BB	H	H	H	H
550 S Vermont	600 H	H	H	H	H
550 S Vermont	601 H	H	H	H	H
550 S Vermont	602 H	H	H	H	H
550 S Vermont	603 H	H	H	H	H
550 S Vermont	604 H	H	H	H	H
550 S Vermont	605 H	H	H	H	H
550 S Vermont	606 H	H	H	AA	AA
550 S Vermont	607 H	H	H	H	H
550 S Vermont	608 H	H	H	H	H
550 S Vermont	609 H	H	H	H	H
550 S Vermont	610 H	H	H	AA	AA

550 S Vermont	611 H	H	H	H	H
550 S Vermont	612 H	H	H	H	H
550 S Vermont	613 H	H	H	H	H
550 S Vermont	614 H	H	H	H	H
550 S Vermont	615 H	H	H	H	H
550 S Vermont	616 H	H	H	H	H
550 S Vermont	617 H	H	H	H	H
550 S Vermont	618 H	H	H	H	H
550 S Vermont	619 Z	H	H	H	H
550 S Vermont	620 H	H	H	H	H
550 S Vermont	621 H	H	H	H	F
550 S Vermont	622 H	H	H	H	H
550 S Vermont	623 BB	H	H	H	H
550 S Vermont	624 Z	H	H	H	H
550 S Vermont	625 H	H	BB	BB	AA
550 S Vermont	626 H	H	H	H	H
550 S Vermont	627 H	H	H	H	H
550 S Vermont	628 H	H	H	H	H
550 S Vermont	629 H	H	H	H	H
550 S Vermont	630 H	H	H	H	I
550 S Vermont	631 H	H	H	H	H
550 S Vermont	632 H	H	H	H	H
550 S Vermont	633 H	H	H	H	H
550 S Vermont	634 H	H	H	H	H
550 S Vermont	635 H	H	H	H	H
550 S Vermont	636 H	H	H	H	H
695 S Vermont	1 J	J	J	J	J
695 S Vermont	2 C	C	C	C	Z
695 S Vermont	3 C	C	C	C	C
695 S Vermont	4 A	A	A	A	A
695 S Vermont	5 AA	AA	H	H	Z
695 S Vermont	6 B	B	B	AA	Z
695 S Vermont	7 J	J	J	J	Z
695 S Vermont	8 B	B	B	B	Z
695 S Vermont	9 M	M	M	M	M
695 S Vermont	10 J	J	J	J	J
695 S Vermont	11 F	F	F	F	F
695 S Vermont	12 AA	AA	AA	AA	AA
695 S Vermont	13 J	J	J	J	CC
695 S Vermont	14 B	B	B	B	Z
695 S Vermont	15 B	B	B	B	B
695 S Vermont	16 H	H	B	H	Z
695 S Vermont	17 C	C	C	C	C
695 S Vermont	18 J	J	J	J	J
695 S Vermont	19 C	H	H	H	H
695 S Vermont	20 J	J	J	J	J
695 S Vermont	21 B	BB	BB	BB	Z

695 S Vermont	22 BB	C	C	C	C
695 S Vermont	23 H	H	J	J	J
695 S Vermont	24 J	J	J	J	J
695 S Vermont	25 J	J	J	J	J
695 S Vermont	26 C	C	C	C	C
695 S Vermont	27 Z	C	C	C	C
695 S Vermont	28 C	C	C	C	C
695 S Vermont	29 H	H	J	J	Z
695 S Vermont	30 C	C	C	C	C
695 S Vermont	31 Z	K	K	K	K
695 S Vermont	32 C	C	C	C	C
695 S Vermont	33 CC	B	B	B	B
695 S Vermont	34 C	C	C	C	C
695 S Vermont	35 AA	AA	AA	AA	AA
695 S Vermont	36 AA	AA	AA	AA	AA
695 S Vermont	37 Z	C	C	C	C
695 S Vermont	38 AA	AA	AA	AA	AA
695 S Vermont	39 H	H	AA	AA	AA
695 S Vermont	40 B	B	B	B	B
695 S Vermont	41 K	K	K	K	K
695 S Vermont	42 B	B	B	B	B
695 S Vermont	43 C	C	C	C	C
695 S Vermont	44 C	C	C	C	C
695 S Vermont	45 C	C	C	C	Z
695 S Vermont	46 H	CC	CC	CC	CC
695 S Vermont	47 J	J	J	J	CC
695 S Vermont	48 AA	C	C	C	Z
695 S Vermont	49 C	C	C	C	Z
695 S Vermont	50 C	C	C	C	C
695 S Vermont	51 C	C	C	C	C
695 S Vermont	52 CC	C	H	H	C
695 S Vermont	53 H	J	J	J	J
695 S Vermont	54 C	C	C	C	C
695 S Vermont	55 C	C	C	C	Z
695 S Vermont	56 C	C	C	C	AA
695 S Vermont	57 C	C	C	C	Z
695 S Vermont	58 J	J	J	J	J
695 S Vermont	59 C	C	C	C	Z
695 S Vermont	60 C	C	C	C	C
695 S Vermont	61 B	B	B	B	B
695 S Vermont	62 B	B	B	B	B
695 S Vermont	63 H	J	J	J	Z
695 S Vermont	64 B	B	B	B	B
695 S Vermont	65 J	J	J	J	J
695 S Vermont	66 C	C	C	C	C
695 S Vermont	67 BB	BB	BB	BB	BB
695 S Vermont	68 B	B	B	B	B

695 S Vermont	69 C	C	C	C	CC
695 S Vermont	70 C	C	C	C	C
695 S Vermont	71 H	H	H	AA	AA
695 S Vermont	72 C	C	C	C	Z
695 S Vermont	73 CC	AA	AA	AA	AA
695 S Vermont	74 F	H	J	H	H
695 S Vermont	75 H	H	BB	H	Z
695 S Vermont	76 H	C	H	H	H
695 S Vermont	77 BB	H	H	H	H
695 S Vermont	78 H	H	H	H	F
695 S Vermont	79 BB	BB	BB	BB	BB
695 S Vermont	80 J	J	J	J	J
695 S Vermont	81 AA	H	H	H	Z
695 S Vermont	82 F	H	F	H	CC
695 S Vermont	83 C	C	C	C	C
695 S Vermont	84 B	B	B	B	B
695 S Vermont	85 C	C	C	C	Z
695 S Vermont	86 CC	B	B	BB	BB
695 S Vermont	87 B	B	B	B	CC
695 S Vermont	88 C	AA	C	C	C
695 S Vermont	89 J	J	AA	AA	Z
695 S Vermont	90 C	C	C	C	C
695 S Vermont	91 H	AA	H	H	CC
695 S Vermont	92 H	H	H	BB	Z
695 S Vermont	93 C	C	C	C	C
695 S Vermont	94 C	C	C	C	C
695 S Vermont	95 C	C	C	C	C
695 S Vermont	96 C	C	C	C	C
695 S Vermont	97 B	B	B	B	CC
695 S Vermont	98 CC	C	C	C	C
695 S Vermont	99 O	N	M	N	M
695 S Vermont	100 C	C	C	C	Z
695 S Vermont	101 C	C	C	C	C
695 S Vermont	102 B	B	B	B	B
695 S Vermont	103 H	H	B	B	B
695 S Vermont	104 B	B	B	B	B
695 S Vermont	105 B	B	B	B	B
695 S Vermont	106 Z	C	C	C	CC
695 S Vermont	107 J	C	AA	C	C
695 S Vermont	108 H	H	BB	BB	H
695 S Vermont	109 H	H	AA	AA	AA
695 S Vermont	110 C	C	C	C	C
695 S Vermont	111 C	C	C	C	C
695 S Vermont	112 H	H	H	H	CC
695 S Vermont	113 C	C	C	C	C
695 S Vermont	114 H	H	H	H	H
695 S Vermont	115 C	C	C	C	C

695 S Vermont	116 H	H	J	H	J
695 S Vermont	117 H	H	H	H	H
695 S Vermont	118 H	H	H	H	H
695 S Vermont	119 C	C	C	C	C
695 S Vermont	120 H	H	H	H	Z
695 S Vermont	121 H	H	H	H	H
695 S Vermont	122 J	H	J	J	J
695 S Vermont	123 H	H	H	H	CC
695 S Vermont	124 H	H	H	H	Z
695 S Vermont	125 D	D	D	D	D
695 S Vermont	126 H	H	H	H	CC
695 S Vermont	127 H	H	H	H	F
695 S Vermont	128 K	K	K	CC	CC
695 S Vermont	129 AA	H	H	H	H
695 S Vermont	130 Z	H	H	H	H
695 S Vermont	131 AA	AA	H	H	Z
695 S Vermont	132 H	H	H	H	Z
695 S Vermont	133 CC	H	H	H	H
695 S Vermont	134 H	H	H	H	Y
695 S Vermont	135 H	H	H	H	CC
695 S Vermont	136 H	H	H	H	AA
695 S Vermont	137 H	H	H	H	H
695 S Vermont	138 H	H	H	H	Z
695 S Vermont	139 CC	H	H	H	H
695 S Vermont	140 H	H	H	H	Z
695 S Vermont	141 CC	H	H	H	H
695 S Vermont	142 H	H	H	H	AA
695 S Vermont	143 H	H	H	H	CC
695 S Vermont	144 H	H	H	H	Z
695 S Vermont	145 Z	H	H	H	H
695 S Vermont	146 H	H	H	H	Y
695 S Vermont	147 H	H	H	H	Z
695 S Vermont	148 H	H	H	H	Z
695 S Vermont	149 CC	H	H	H	H
695 S Vermont	150 H	H	H	H	Z
695 S Vermont	151 Z	H	H	H	H
695 S Vermont	152 Z	H	H	H	H
695 S Vermont	153 H	H	H	H	H
695 S Vermont	154 CC	H	H	H	H
695 S Vermont	155 H	H	H	H	CC
695 S Vermont	156 H	H	H	H	Z
695 S Vermont	157 Z	H	H	H	H
695 S Vermont	158 H	H	H	H	Z
695 S Vermont	159 H	H	H	H	Z
695 S Vermont	160 H	H	H	H	Z
695 S Vermont	161 H	H	H	H	Z
695 S Vermont	162 C	H	C	H	C

695 S Vermont	163 H	H	CC	H	H
695 S Vermont	164 H	H	CC	H	H
695 S Vermont	165 B	B	B	B	B
695 S Vermont	166 H	H	H	H	Z
695 S Vermont	167 CC	H	H	H	H
695 S Vermont	168 H	H	H	H	Z
695 S Vermont	169 Z	H	H	H	H
695 S Vermont	170 H	H	H	H	Z
695 S Vermont	171 Y	H	H	H	H
695 S Vermont	172 B	B	BB	B	B
695 S Vermont	173 AA	H	H	H	H
695 S Vermont	174 H	H	H	H	AA
695 S Vermont	175 Z	H	H	H	H
695 S Vermont	176 H	H	H	H	I
695 S Vermont	177 H	AA	H	H	H
695 S Vermont	178 H	H	H	H	H
695 S Vermont	179 H	H	H	H	CC
695 S Vermont	180 H	H	H	H	AA
695 S Vermont	181 Z	H	H	H	H
695 S Vermont	182 Z	H	H	H	H
695 S Vermont	183 CC	H	H	H	H
695 S Vermont	184 BB	H	H	H	Z
695 S Vermont	185 B	H	B	B	H
695 S Vermont	186 J	C	J	C	Z
695 S Vermont	187 H	H	H	H	CC
695 S Vermont	188 B	B	B	B	Z
695 S Vermont	189 H	H	H	H	H
695 S Vermont	190 H	H	H	H	H
695 S Vermont	191 H	H	H	H	CC
695 S Vermont	192 H	H	H	H	H
695 S Vermont	193 H	H	H	H	Z
695 S Vermont	194 H	H	H	H	H
695 S Vermont	195 H	H	H	H	CC
695 S Vermont	196 H	H	H	H	Z
695 S Vermont	197 H	H	H	H	H
695 S Vermont	198 B	B	B	B	B
695 S Vermont	199 H	H	H	H	H
695 S Vermont	200 B	B	B	B	CC
695 S Vermont	201 H	H	H	H	H
695 S Vermont	202 C	C	C	C	Z
695 S Vermont	203 H	H	H	H	H
695 S Vermont	204 H	H	H	H	H
695 S Vermont	205 H	J	H	H	J
695 S Vermont	206 C	C	C	C	C
695 S Vermont	207 B	J	J	B	J
695 S Vermont	208 C	C	BB	C	Z
695 S Vermont	209 C	H	C	BB	H

695 S Vermont	210 Z	J	J	J	J
695 S Vermont	211 A	A	A	A	A
695 S Vermont	212 AA	AA	AA	H	H
695 S Vermont	213 Z	BB	H	H	H
695 S Vermont	214 H	H	H	H	AA
695 S Vermont	215 H	J	J	J	H
695 S Vermont	216 H	J	J	J	CC
695 S Vermont	217 H	H	H	H	H
695 S Vermont	218 H	BB	H	H	H
695 S Vermont	219 H	H	H	H	Z
695 S Vermont	220 H	H	H	H	J
695 S Vermont	221 H	H	H	H	Z
695 S Vermont	222 H	H	H	H	CC
695 S Vermont	223 H	H	H	H	CC
695 S Vermont	224 H	H	H	H	CC
695 S Vermont	225 H	H	H	H	AA
695 S Vermont	226 H	H	BB	H	H
695 S Vermont	227 H	H	H	H	Z
695 S Vermont	228 H	H	H	H	Z
695 S Vermont	229 H	H	H	H	Z
695 S Vermont	230 H	H	H	H	H
695 S Vermont	231 H	H	H	H	H
695 S Vermont	232 H	H	H	H	H
695 S Vermont	233 H	H	H	H	H
695 S Vermont	234 H	H	H	H	H
695 S Vermont	235 H	H	H	H	AA
695 S Vermont	236 H	H	H	H	Z
695 S Vermont	237 H	H	H	H	H
695 S Vermont	238 H	H	H	H	Z
695 S Vermont	239 H	H	H	H	H
695 S Vermont	240 H	H	H	H	H
695 S Vermont	241 H	H	H	H	H
695 S Vermont	242 H	H	H	H	H
695 S Vermont	243 H	H	H	H	Z
695 S Vermont	244 BB	H	H	H	H
695 S Vermont	245 H	H	H	H	H
695 S Vermont	246 H	H	H	H	H
695 S Vermont	247 H	H	H	H	Z
695 S Vermont	248 H	H	H	H	H
695 S Vermont	249 H	H	H	H	H
695 S Vermont	250 H	H	H	H	H
695 S Vermont	251 H	H	H	H	H
695 S Vermont	252 H	H	H	H	H
695 S Vermont	253 H	H	H	H	H
695 S Vermont	254 H	H	H	H	H
695 S Vermont	255 H	H	H	H	H
695 S Vermont	256 H	H	H	H	H

695 S Vermont	257 H	H	H	H	H
695 S Vermont	258 H	H	H	H	H
695 S Vermont	259 H	H	H	H	H
695 S Vermont	260 H	H	H	H	H
695 S Vermont	261 H	H	H	H	H
695 S Vermont	262 H	H	H	H	H
695 S Vermont	263 H	H	H	H	H
695 S Vermont	264 H	H	H	H	H
695 S Vermont	265 H	H	H	H	H
695 S Vermont	266 H	H	H	H	H
695 S Vermont	267 H	H	H	H	H
695 S Vermont	268 H	H	H	H	H
695 S Vermont	269 H	H	H	H	H
695 S Vermont	270 H	H	H	H	H
695 S Vermont	271 H	H	H	H	H
695 S Vermont	272 H	H	H	H	H
695 S Vermont	273 H	H	H	H	H
695 S Vermont	274 H	H	H	H	H
695 S Vermont	275 H	H	H	H	H
695 S Vermont	276 H	H	H	H	H
695 S Vermont	277 H	H	H	H	H
695 S Vermont	278 H	H	H	H	H
695 S Vermont	279 H	H	H	H	H
695 S Vermont	280 H	H	H	H	H
695 S Vermont	281 H	H	H	H	H
695 S Vermont	282 H	H	H	H	H
695 S Vermont	283 H	H	H	H	H
695 S Vermont	284 H	H	H	H	H
695 S Vermont	285 H	H	H	H	H
695 S Vermont	286 H	H	H	H	H
695 S Vermont	287 H	H	H	H	H
695 S Vermont	288 H	H	H	H	H
695 S Vermont	289 H	H	H	H	H
695 S Vermont	290 H	H	H	H	H
695 S Vermont	291 H	H	H	H	H
695 S Vermont	292 H	H	H	H	H
695 S Vermont	293 H	H	H	H	H
695 S Vermont	294 H	H	H	H	H
695 S Vermont	295 H	H	H	H	H
695 S Vermont	296 H	H	H	H	H
695 S Vermont	297 H	H	H	H	H

Typical Mode of Transportation	Transportation Category
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
7 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
WALK	WALK/BICYCLE
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
WALK	WALK/BICYCLE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
3 PERSONS IN VEHICLE	CARPOOL
3 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE

RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
15 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
4 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE

DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
14 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
ZERO EMISSION VEHICLE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
WALK	WALK/BICYCLE
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION

RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
6 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
WALK	WALK/BICYCLE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
#N/A	#N/A
RAIL	PUBLIC TRANSPORTATION
DAY OFF- SICK	OTHER
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
3 PERSONS IN VEHICLE	CARPOOL
3 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION

DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
WALK	WALK/BICYCLE
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DAY OFF- REGULAR DAY OFF- JURY	OTHER
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION

2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
#N/A	#N/A
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
#N/A	#N/A
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
BUS	PUBLIC TRANSPORTATION

DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF- SICK	OTHER
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE

RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DAY OFF-VACATION	OTHER
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
DAY OFF-VACATION	OTHER
DAY OFF-VACATION	OTHER
BUS	PUBLIC TRANSPORTATION
3 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DAY OFF- REGULAR DAY OFF- JURY	OTHER
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
BUS	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
DAY OFF- SICK	OTHER
BUS	PUBLIC TRANSPORTATION

RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DAY OFF-VACATION	OTHER
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
DAY OFF- SICK	OTHER
2 PERSONS IN VEHICLE	CARPOOL
DRIVE ALONE	DRIVE ALONE
TELECOMMUTE	OTHER
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
2 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
6 PERSONS IN VEHICLE	CARPOOL
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
BUS	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
DAY OFF-VACATION	OTHER
RAIL	PUBLIC TRANSPORTATION
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION
DRIVE ALONE	DRIVE ALONE
RAIL	PUBLIC TRANSPORTATION

Typical Mode of Transportation	Count of Responses	% of Total
DRIVE ALONE	584	62.59%
PUBLIC TRANSPORTATION	217	23.26%
CARPOOL	89	9.54%
OTHER	34	3.64%
WALK/BICYCLE	6	0.64%
#N/A	3	0.32%
(blank)		0.00%
Grand Total	933	100.00%

B

SB 35 Statewide Determination Summary

SB 35 Statewide Determination Summary

Cities and Counties Not Currently Subject to SB 35 Streamlining Provisions

This determination represents Annual Progress Report (APR) data received as of January 31, 2018, and will be updated at least quarterly to incorporate new or corrected data provided by jurisdictions. The following 13 jurisdictions have met their prorated Lower (Very-Low and Low) and Above-Moderate Income Regional Housing Needs Assessment (RHNA) for the Reporting Period and submitted their latest APR (2016). These jurisdictions are not currently subject to SB 35 (Chapter 366, Statutes of 2017) streamlining, but the jurisdictions are still encouraged to promote streamlining. **All other cities and counties beyond these 13 are subject to at least some form of SB 35 streamlining, as indicated on the following page.**

For more detail on the proration methodology or background data see the SB 35 Determination Methodology.

	JURISDICTION
1	BEVERLY HILLS
2	CARPINTERIA
3	CORTE MADERA
4	FOSTER CITY
5	HILLSBOROUGH
6	LEMON GROVE
7	NAPA COUNTY
8	SAN ANSELMO
9	SAN FERNANDO
10	SAN LUIS OBISPO
11	SANTA BARBARA COUNTY
12	SONOMA COUNTY
13	WEST HOLLYWOOD

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include \geq 10% Affordability

When jurisdictions have insufficient progress toward their Above Moderate income RHNA and/or have not submitted the most recent Annual Progress Report (2016), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 10% affordability.

These conditions currently apply to the following 378 jurisdictions:

JURISDICTION		JURISDICTION		JURISDICTION	
1	ADELANTO	31	BIGGS	61	CLEARLAKE
2	ALAMEDA COUNTY	32	BISHOP	62	CLOVERDALE
3	ALISO VIEJO	33	BLUE LAKE	63	CLOVIS
4	ALPINE COUNTY	34	BLYTHE	64	COACHELLA
5	ALTURAS	35	BRADBURY	65	COALINGA
6	AMADOR	36	BRAWLEY	66	COLFAX
7	AMADOR COUNTY	37	BREA	67	COLMA
8	ANDERSON	38	BUENA PARK	68	COLTON
9	ANGELS CAMP	39	BURBANK	69	COLUSA
10	APPLE VALLEY	40	BUTTE COUNTY	70	COLUSA COUNTY
11	ARCADIA	41	CALABASAS	71	COMMERCE
12	ARCATA	42	CALAVERAS COUNTY	72	COMPTON
13	ARROYO GRANDE	43	CALEXICO	73	CONCORD
14	ARTESIA	44	CALIFORNIA CITY	74	CORCORAN
15	ARVIN	45	CALIMESA	75	CORNING
16	ATWATER	46	CALIPATRIA	76	COTATI
17	AUBURN	47	CAMARILLO	77	COVINA
18	AVALON	48	CANYON LAKE	78	CRESCENT CITY
19	AVENAL	49	CAPITOLA	79	CUDAHY
20	AZUSA	50	CARLSBAD	80	CULVER CITY
21	BAKERSFIELD	51	CARMEL	81	CYPRESS
22	BALDWIN PARK	52	CARSON	82	DEL NORTE COUNTY
23	BANNING	53	CATHEDRAL	83	DEL REY OAKS
24	BARSTOW	54	CERES	84	DELANO
25	BEAUMONT	55	CERRITOS	85	DESERT HOT SPRINGS
26	BELL GARDENS	56	CHINO	86	DIAMOND BAR
27	BELMONT	57	CHOWCHILLA	87	DINUBA
28	BELVEDERE	58	CITRUS HEIGHTS	88	DIXON
29	BENICIA	59	CLAREMONT	89	DORRIS
30	BIG BEAR LAKE	60	CLAYTON	90	DOS PALOS

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include $\geq 10\%$ Affordability

When jurisdictions have insufficient progress toward their Above Moderate income RHNA and/or have not submitted the most recent Annual Progress Report (2016), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 10% affordability.

These conditions currently apply to the following 378 jurisdictions:

JURISDICTION		JURISDICTION		JURISDICTION	
91	DOWNEY	131	HERMOSA BEACH	171	LAKE ELSINORE
92	DUARTE	132	HESPERIA	172	LAKEPORT
93	DUNSMUIR	133	HIDDEN HILLS	173	LANCASTER
94	EAST PALO ALTO	134	HIGHLAND	174	LASSEN COUNTY
95	EASTVALE	135	HOLLISTER	175	LATHROP
96	EL CAJON	136	HOLTVILLE	176	LAWNDALE
97	EL CENTRO	137	HUGHSON	177	LEMOORE
98	EL MONTE	138	HUMBOLDT COUNTY	178	LINCOLN
99	EL SEGUNDO	139	HUNTINGTON BEACH	179	LINDSAY
100	EMERYVILLE	140	HUNTINGTON PARK	180	LIVE OAK
101	ENCINITAS	141	HURON	181	LIVINGSTON
102	ESCALON	142	IMPERIAL	182	LODI
103	ESCONDIDO	143	IMPERIAL BEACH	183	LOMA LINDA
104	ETNA	144	IMPERIAL COUNTY	184	LOMITA
105	EUREKA	145	INDUSTRY	185	LOMPOC
106	EXETER	146	INGLEWOOD	186	LONG BEACH
107	FAIRFAX	147	INYO COUNTY	187	LOOMIS
108	FARMERSVILLE	148	IONE	188	LOS ALAMITOS
109	FERNDALE	149	IRWINDALE	189	LOS ALTOS HILLS
110	FILLMORE	150	ISLETON	190	LOS ANGELES COUNTY
111	FIREBAUGH	151	JACKSON	191	LOS BANOS
112	FORT BRAGG	152	JURUPA VALLEY	192	LOYALTON
113	FORT JONES	153	KERMAN	193	LYNWOOD
114	FORTUNA	154	KERN COUNTY	194	MADERA
115	FOUNTAIN VALLEY	155	KING CITY	195	MALIBU
116	FOWLER	156	KINGS COUNTY	196	MANHATTAN BEACH
117	FRESNO	157	KINGSBURG	197	MANTECA
118	GARDENA	158	LA CANADA FLINTRIDGE	198	MARICOPA
119	GLENN COUNTY	159	LA HABRA	199	MARINA
120	GONZALES	160	LA HABRA HEIGHTS	200	MARTINEZ
121	GRAND TERRACE	161	LA MESA	201	MARYSVILLE
122	GRASS VALLEY	162	LA MIRADA	202	MAYWOOD
123	GREENFIELD	163	LA PALMA	203	MCFARLAND
124	GRIDLEY	164	LA PUENTE	204	MENDOCINO COUNTY
125	GUADALUPE	165	LA QUINTA	205	MENDOTA
126	GUSTINE	166	LA VERNE	206	MENIFEE
127	HALF MOON BAY	167	LAGUNA BEACH	207	MENLO PARK
128	HANFORD	168	LAGUNA NIGUEL	208	MERCED
129	HAWAIIAN GARDENS	169	LAGUNA WOODS	209	MERCED COUNTY
130	HAYWARD	170	LAKE COUNTY	210	MILL VALLEY

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include \geq 10% Affordability

When jurisdictions have insufficient progress toward their Above Moderate income RHNA and/or have not submitted the most recent Annual Progress Report (2016), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 10% affordability.

These conditions currently apply to the following 378 jurisdictions:

JURISDICTION		JURISDICTION		JURISDICTION	
211	MILLBRAE	251	PISMO BEACH	291	SAN DIMAS
212	MODESTO	252	PLEASANT HILL	292	SAN GABRIEL
213	MODOC COUNTY	253	PLYMOUTH	293	SAN JACINTO
214	MONTAGUE	254	POINT ARENA	294	SAN JOAQUIN
215	MONTCLAIR	255	POMONA	295	SAN JOAQUIN COUNTY
216	MONTEBELLO	256	PORT HUENEME	296	SAN JUAN BAUTISTA
217	MONTEREY	257	PORTERVILLE	297	SAN LEANDRO
218	MONTEREY PARK	258	PORTOLA	298	SAN MATEO COUNTY
219	MORAGA	259	POWAY	299	SAND CITY
220	MORENO VALLEY	260	RANCHO CORDOVA	300	SANGER
221	MORRO BAY	261	RANCHO MIRAGE	301	SANTA BARBARA
222	MOUNT SHASTA	262	RED BLUFF	302	SANTA CLARITA
223	MURRIETA	263	REDDING	303	SANTA CRUZ COUNTY
224	NATIONAL CITY	264	REDLANDS	304	SANTA MONICA
225	NEEDLES	265	REDONDO BEACH	305	SANTA PAULA
226	NEVADA CITY	266	REDWOOD CITY	306	SANTA ROSA
227	NEWARK	267	REEDLEY	307	SANTEE
228	NEWMAN	268	RIALTO	308	SARATOGA
229	NORCO	269	RICHMOND	309	SAUSALITO
230	NORWALK	270	RIDGECREST	310	SCOTTS VALLEY
231	NOVATO	271	RIO DELL	311	SEAL BEACH
232	OCEANSIDE	272	RIO VISTA	312	SEASIDE
233	OJAI	273	RIPON	313	SEBASTOPOL
234	ONTARIO	274	RIVERBANK	314	SELMA
235	ORANGE	275	RIVERSIDE	315	SHAFTER
236	ORANGE COVE	276	RIVERSIDE COUNTY	316	SHASTA COUNTY
237	ORLAND	277	ROHNERT PARK	317	SHASTA LAKE
238	OROVILLE	278	ROLLING HILLS	318	SIERRA COUNTY
239	OXNARD	279	ROLLING HILLS ESTATES	319	SIERRA MADRE
240	PACIFIC GROVE	280	ROSEMEAD	320	SIGNAL HILL
241	PACIFICA	281	SACRAMENTO	321	SISKIYOU COUNTY
242	PALM DESERT	282	SACRAMENTO COUNTY	322	SOLANA BEACH
243	PALM SPRINGS	283	SALINAS	323	SOLEDAD
244	PALMDALE	284	SAN BENITO COUNTY	324	SOLVANG
245	PALOS VERDES ESTATES	285	SAN BERNARDINO	325	SONOMA
246	PARADISE	286	SAN BERNARDINO COUNTY	326	SONORA
247	PARAMOUNT	287	SAN BRUNO	327	SOUTH EL MONTE
248	PATTERSON	288	SAN BUENAVENTURA	328	SOUTH GATE
249	PICO RIVERA	289	SAN CLEMENTE	329	SOUTH LAKE TAHOE
250	PINOLE	290	SAN DIEGO COUNTY	330	SOUTH PASADENA

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include \geq 10% Affordability

When jurisdictions have insufficient progress toward their Above Moderate income RHNA and/or have not submitted the most recent Annual Progress Report (2016), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 10% affordability.

These conditions currently apply to the following 378 jurisdictions:

JURISDICTION		JURISDICTION	
331	SOUTH SAN FRANCISCO	371	WINTERS
332	STOCKTON	372	WOODLAKE
333	SUSANVILLE	373	YOLO COUNTY
334	SUTTER COUNTY	374	YREKA
335	TEHACHAPI	375	YUBA CITY
336	TEHAMA	376	YUBA COUNTY
337	TEHAMA COUNTY	377	YUCAIPA
338	TEMECULA	378	YUCCA VALLEY
339	TEMPLE CITY		
340	TIBURON		
341	TORRANCE		
342	TRACY		
343	TRINIDAD		
344	TRINITY COUNTY		
345	TRUCKEE		
346	TULARE		
347	TULARE COUNTY		
348	TULELAKE		
349	TUOLUMNE COUNTY		
350	TURLOCK		
351	TWENTYNINE PALMS		
352	UKIAH		
353	UNION CITY		
354	UPLAND		
355	VALLEJO		
356	VENTURA COUNTY		
357	VERNON		
358	VICTORVILLE		
359	VILLA PARK		
360	WATERFORD		
361	WATSONVILLE		
362	WEED		
363	WEST SACRAMENTO		
364	WESTLAKE VILLAGE		
365	WESTMORLAND		
366	WHEATLAND		
367	WHITTIER		
368	WILLIAMS		
369	WILLITS		
370	WILLOWS		

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include \geq 50% Affordability

When jurisdictions have insufficient progress toward their Lower income RHNA (Very Low and Low income), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 50% affordability. If the jurisdiction also has insufficient progress toward their Above Moderate income RHNA, then they are subject to the more inclusive streamlining for developments with at least 10% affordability.

The following list includes the 148 jurisdictions that are not subject to SB 35 streamlining for proposed developments with \geq 10% affordability, but are subject to SB 35 streamlining for proposed developments with \geq 50% affordability.

JURISDICTION		JURISDICTION		JURISDICTION	
1	AGOURA HILLS	36	FAIRFIELD	71	MONO COUNTY
2	ALAMEDA	37	FOLSOM	72	MONROVIA
3	ALBANY	38	FONTANA	73	MONTE SERENO
4	ALHAMBRA	39	FREMONT	74	MONTEREY COUNTY
5	AMERICAN CANYON	40	FRESNO COUNTY	75	MOORPARK
6	ANAHEIM	41	FULLERTON	76	MORGAN HILL
7	ANTIOCH	42	GALT	77	MOUNTAIN VIEW
8	ATASCADERO	43	GARDEN GROVE	78	NAPA
9	ATHERTON	44	GILROY	79	NEVADA COUNTY
10	BELL	45	GLENDALE	80	NEWPORT BEACH
11	BELLFLOWER	46	GLENDORA	81	OAKDALE
12	BERKELEY	47	GOLETA	82	OAKLAND
13	BRENTWOOD	48	GROVER BEACH	83	OAKLEY
14	BRISBANE	49	HAWTHORNE	84	ORANGE COUNTY
15	BUELLTON	50	HEALDSBURG	85	ORINDA
16	BURLINGAME	51	HEMET	86	PALO ALTO
17	CALISTOGA	52	HERCULES	87	PARLIER
18	CAMPBELL	53	INDIAN WELLS	88	PASADENA
19	CHICO	54	INDIO	89	PASO ROBLES
20	CHINO HILLS	55	IRVINE	90	PERRIS
21	CHULA VISTA	56	LAFAYETTE	91	PETALUMA
22	CONTRA COSTA COUNTY	57	LAGUNA HILLS	92	PIEDMONT
23	CORONA	58	LAKE FOREST	93	PITTSBURG
24	CORONADO	59	LAKELAND	94	PLACENTIA
25	COSTA MESA	60	LARKSPUR	95	PLACER COUNTY
26	CUPERTINO	61	LIVERMORE	96	PLACERVILLE
27	DALY CITY	62	LOS ALTOS	97	PLEASANTON
28	DANA POINT	63	LOS ANGELES	98	PLUMAS COUNTY
29	DANVILLE	64	LOS GATOS	99	PORTOLA VALLEY
30	DAVIS	65	MADERA COUNTY	100	RANCHO CUCAMONGA
31	DEL MAR	66	MAMMOTH LAKES	101	RANCHO PALOS VERDES
32	DUBLIN	67	MARIN COUNTY	102	RANCHO SANTA MARGARITA
33	EL CERRITO	68	MARIPOSA COUNTY	103	ROCKLIN
34	EL DORADO COUNTY	69	MILPITAS	104	ROSEVILLE
35	ELK GROVE	70	MISSION VIEJO	105	ROSS

SB 35 Statewide Determination Summary

Cities and Counties Subject to SB 35 Streamlining Provisions

When Proposed Developments Include \geq 50% Affordability

When jurisdictions have insufficient progress toward their Lower income RHNA (Very Low and Low income), these jurisdictions are subject to SB 35 (Chapter 366, Statutes of 2017) streamlining for proposed developments with at least 50% affordability. If the jurisdiction also has insufficient progress toward their Above Moderate income RHNA, then they are subject to the more inclusive streamlining for developments with at least 10% affordability.

The following list includes the 148 jurisdictions that are not subject to SB 35 streamlining for proposed developments with \geq 10% affordability, but are subject to SB 35 streamlining for proposed developments with \geq 50% affordability.

JURISDICTION		JURISDICTION	
106	SAINT HELENA	147	YORBA LINDA
107	SAN CARLOS	148	YOUNTVILLE
108	SAN DIEGO		
109	SAN FRANCISCO		
110	SAN JOSE		
111	SAN JUAN CAPISTRANO		
112	SAN LUIS OBISPO COUNTY		
113	SAN MARCOS		
114	SAN MARINO		
115	SAN MATEO		
116	SAN PABLO		
117	SAN RAFAEL		
118	SAN RAMON		
119	SANTA ANA		
120	SANTA CLARA		
121	SANTA CLARA COUNTY		
122	SANTA CRUZ		
123	SANTA FE SPRINGS		
124	SANTA MARIA		
125	SIMI VALLEY		
126	SOLANO COUNTY		
127	STANISLAUS COUNTY		
128	STANTON		
129	SUISUN CITY		
130	SUNNYVALE		
131	SUTTER CREEK		
132	TAFT		
133	THOUSAND OAKS		
134	TUSTIN		
135	VACAVILLE		
136	VISALIA		
137	VISTA		
138	WALNUT		
139	WALNUT CREEK		
140	WASCO		
141	WEST COVINA		
142	WESTMINSTER		
143	WILDOMAR		
144	WINDSOR		
145	WOODLAND		
146	WOODSIDE		

SB 35 Determination Methodology

SB 35 Reporting Period

SB 35 defines the Reporting Period as the first half of the regional housing needs assessment (RHNA) cycle or the second half of the RHNA cycle. For jurisdictions that have not completed the first half of the current (fifth) RHNA cycle, a proration will apply until the jurisdiction completes the first-half point of the cycle.

Prorated targets will be updated after Annual Progress Reports (APRs) are due each year.

APRs are on calendar years, while RHNA planning periods¹ may begin and end at various times throughout the year. When a planning period begins after July, the APR for that year is attributed to the prior RHNA cycle. When the planning period ends before July 1, the APR for that year will be attributed to the following RHNA cycle.

More detail is shown below by regional government or county and applies to all jurisdictions within the regional government or county.

Credit for Permitting during Projection Period

Jurisdictions can count permits that occurred during the projection period² before the planning period began on the first APR of the planning period.

Annual Progress Report (APRs) Due Dates

APRs are due each April and report on the prior calendar year's activities. As of January 2018, 2016 APRs and prior APRs were due; as of April 2018, 2017 APRs and prior APRs will have been due.

¹ **Planning Period:** The time-period between the due date for one housing element and the due date for the next housing element. This time-period can be either 8 or 5 years, depending on the jurisdiction.

² **Projection Period:** The time-period for which the regional housing need assessment (RHNA) is calculated.

Association of Monterey Bay Area Governments (AMBAG) and San Benito County Council of Governments (San Benito COG) – includes Monterey, Santa Cruz, and San Benito Counties; and all cities within each county

5th Cycle Planning Period: 12/15/2015⁸ – 12/15/2023

5th Cycle Projection Period: 01/01/2014 – 12/31/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014 and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁸ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

Fresno Council of Governments (FCOG) and Kern Council of Governments (KCOG) – includes Fresno and Kern Counties; and all cities within each county

5th Cycle Planning Period: 12/31/2015⁹ – 12/31/2023

5th Cycle Projection Period: 01/01/2013 – 12/31/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2013, 2014, and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁹ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

Stanislaus County Council of Governments (Stan COG) and Tulare County Association of Governments (TCAG) – includes Stanislaus and Tulare Counties; and all cities within each county

5th Cycle Planning Period: 12/31/2015¹⁰ – 12/31/2023

5th Cycle Projection Period: 01/01/2014 – 09/30/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014 and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

¹⁰ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

San Joaquin County Council of Governments (SJCOG) – includes San Joaquin County and all cities within the County

5th Cycle Planning Period: 12/31/2015¹¹ – 12/31/2023

5th Cycle Projection Period: 01/01/2014 – 12/31/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014 and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

¹¹ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

Kings County Association of Governments (KCAG) and Madera County Transportation Commission (MCTC) – includes Kings and Madera Counties; and all cities within each county

5th Cycle Planning Period: 01/31/2016 – 01/31/2024

5th Cycle Projection Period: 01/01/2014 – 12/31/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014 and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

Merced County Association of Governments (MCAG) – includes Merced County and all cities within the County

5th Cycle Planning Period: 03/31/2016 – 03/31/2024

5th Cycle Projection Period: 01/01/2014 – 12/31/2023

APRs that count towards First Half Reporting Period	2016 2017 2018 2019
APRs that count towards Last Half Reporting Period	2020 2021 2022 2023

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014 and 2015. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 1/8ths (12.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2019 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2023 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

SB 35 Determination for the Counties of Fresno, Kern, Kings, Madera, Merced, Monterey, San Benito, San Joaquin, Santa Cruz, Stanislaus, Tulare; and all cities within each county

These jurisdictions are in the First Half Reporting Period, including 1 year (2016 APRs) of an 8-year planning period. **Less than 12.5% permitting progress toward 5th Cycle regional housing needs assessment (RHNA) for an income category is considered insufficient progress.**

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(Note: Jurisdictions are automatically subject to SB 35 streamlining provisions when latest Annual Progress Report (2016) Not Submitted)

COUNTY	JURISDICTION	VLI % COMPLETE	LI % COMPLETE	MOD % COMPLETE	ABOVE MOD % COMPLETE
KERN	ARVIN	0.0%	20.9%	48.6%	0.0%
SANTA CRUZ	CAPITOLA	0.0%	0.0%	0.0%	5.0%
STANISLAUS	CERES	0.0%	0.0%	0.0%	0.0%
FRESNO	COALINGA	24.0%	27.8%	19.5%	7.5%
KERN	DELANO	0.0%	0.0%	18.9%	0.2%
TULARE	DINUBA	0.0%	39.3%	41.3%	0.0%
FRESNO	FRESNO	0.3%	0.2%	9.6%	8.5%
FRESNO	FRESNO COUNTY	0.0%	0.0%	31.9%	24.8%
SAN BENITO	HOLLISTER	0.0%	0.0%	0.0%	5.4%
STANISLAUS	HUGHSON	0.0%	0.0%	0.0%	3.2%
FRESNO	HURON	0.0%	0.0%	0.0%	0.0%
KERN	KERN COUNTY	2.1%	1.8%	0.0%	0.0%
SAN JOAQUIN	LATHROP	0.0%	0.0%	0.0%	7.0%
TULARE	LINDSAY	8.8%	53.8%	4.9%	0.0%
MERCED	LIVINGSTON	0.0%	0.0%	0.0%	7.8%
MERCED	LOS BANOS	6.8%	4.9%	2.3%	0.0%
MADERA	MADERA	1.3%	24.0%	8.5%	0.2%
MADERA	MADERA COUNTY	0.0%	0.0%	0.0%	*
MADERA	MADERA COUNTY	0.0%	1.9%	0.0%	*
KERN	MCFARLAND	3.2%	3.8%	5.0%	0.0%
MERCED	MERCED COUNTY	0.0%	0.0%	5.2%	7.3%
STANISLAUS	MODESTO	0.0%	2.8%	2.6%	4.4%
MONTEREY	MONTEREY COUNTY	9.9%	2.5%	0.0%	58.8%
STANISLAUS	OAKDALE	0.0%	0.0%	4.8%	32.1%
FRESNO	PARLIER	99.1%	7.3%	3.9%	*
TULARE	PORTERVILLE	0.0%	0.6%	14.0%	0.4%
FRESNO	REEDLEY	14.0%	0.0%	7.5%	0.9%
STANISLAUS	RIVERBANK	10.3%	18.4%	0.0%	9.7%
MONTEREY	SALINAS	4.6%	4.8%	0.2%	12.4%
SAN BENITO	SAN BENITO COUNTY	0.0%	0.0%	25.0%	100.0%
FRESNO	SANGER	0.0%	0.0%	0.0%	0.0%
SANTA CRUZ	SANTA CRUZ	3.3%	18.6%	100.0%	44.1%
SANTA CRUZ	SANTA CRUZ COUNTY	13.2%	11.1%	20.9%	11.1%
STANISLAUS	STANISLAUS COUNTY	0.0%	2.9%	8.4%	20.4%

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COUNTY	JURISDICTION	VLI % COMPLETE	LI % COMPLETE	MOD % COMPLETE	ABOVE MOD % COMPLETE
KERN	TAFT	0.0%	0.0%	0.0%	13.7%
TULARE	TULARE COUNTY	8.3%	8.5%	7.0%	2.4%
STANISLAUS	TURLOCK	0.2%	21.9%	93.8%	1.8%
TULARE	VISALIA	3.3%	11.6%	22.8%	16.7%
KERN	WASCO	0.0%	0.0%	0.0%	38.6%
Merced County	ATWATER	No 2016 Annual Progress Report			
Kings County	AVENAL	No 2016 Annual Progress Report			
Kern County	BAKERSFIELD	No 2016 Annual Progress Report			
Kern County	CALIFORNIA CITY	No 2016 Annual Progress Report			
Monterey County	CARMEL	No 2016 Annual Progress Report			
Madera County	CHOWCHILLA	No 2016 Annual Progress Report			
Fresno County	CLOVIS	No 2016 Annual Progress Report			
Kings County	CORCORAN	No 2016 Annual Progress Report			
Monterey County	DEL REY OAKS	No 2016 Annual Progress Report			
Tulare County	DINUBA	No 2016 Annual Progress Report			
Merced County	DOS PALOS	No 2016 Annual Progress Report			
San Joaquin County	ESCALON	No 2016 Annual Progress Report			
Tulare County	EXETER	No 2016 Annual Progress Report			
Tulare County	FARMERSVILLE	No 2016 Annual Progress Report			
Fresno County	FIREBAUGH	No 2016 Annual Progress Report			
Fresno County	FOWLER	No 2016 Annual Progress Report			
Monterey County	GONZALES	No 2016 Annual Progress Report			
Monterey County	GREENFIELD	No 2016 Annual Progress Report			
Merced County	GUSTINE	No 2016 Annual Progress Report			
Kings County	HANFORD	No 2016 Annual Progress Report			
San Benito County	HOLLISTER	No 2016 Annual Progress Report			
Stanislaus County	HUGHSON	No 2016 Annual Progress Report			
Fresno County	HURON	No 2016 Annual Progress Report			
Fresno County	KERMAN	No 2016 Annual Progress Report			
Monterey County	KING CITY	No 2016 Annual Progress Report			
Kings County	KINGS COUNTY	No 2016 Annual Progress Report			
Fresno County	KINGSBURG	No 2016 Annual Progress Report			
Kings County	LEMOORE	No 2016 Annual Progress Report			
San Joaquin County	LODI	No 2016 Annual Progress Report			

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLETE
San Joaquin County	MANTECA	No 2016 Annual Progress Report			
Kern County	MARICOPA	No 2016 Annual Progress Report			
Monterey County	MARINA	No 2016 Annual Progress Report			
Fresno County	MENDOTA	No 2016 Annual Progress Report			
Merced County	MERCED	No 2016 Annual Progress Report			
Monterey County	MONTEREY	No 2016 Annual Progress Report			
Stanislaus County	NEWMAN	No 2016 Annual Progress Report			
Fresno County	ORANGE COVE	No 2016 Annual Progress Report			
Monterey County	PACIFIC GROVE	No 2016 Annual Progress Report			
Stanislaus County	PATTERSON	No 2016 Annual Progress Report			
Kern County	RIDGECREST	No 2016 Annual Progress Report			
San Joaquin County	RIPON	No 2016 Annual Progress Report			
San Benito County	SAN BENITO COUNTY	No 2016 Annual Progress Report			
Fresno County	SAN JOAQUIN	No 2016 Annual Progress Report			
San Joaquin County	SAN JOAQUIN COUNTY	No 2016 Annual Progress Report			
San Benito County	SAN JUAN BAUTISTA	No 2016 Annual Progress Report			
Monterey County	SAND CITY	No 2016 Annual Progress Report			
Santa Cruz County	SCOTTS VALLEY	No 2016 Annual Progress Report			
Monterey County	SEASIDE	No 2016 Annual Progress Report			
Fresno County	SELMA	No 2016 Annual Progress Report			
Kern County	SHAFTER	No 2016 Annual Progress Report			
Monterey County	SOLEDAD	No 2016 Annual Progress Report			
San Joaquin County	STOCKTON	No 2016 Annual Progress Report			
Kern County	TEHACHAPI	No 2016 Annual Progress Report			
San Joaquin County	TRACY	No 2016 Annual Progress Report			
Tulare County	TULARE	No 2016 Annual Progress Report			
Stanislaus County	WATERFORD	No 2016 Annual Progress Report			
Santa Cruz County	WATSONVILLE	No 2016 Annual Progress Report			
Tulare County	WOODLAKE	No 2016 Annual Progress Report			

Association of Bay Area Governments (ABAG) Now Bay Area Metro – includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties; and all cities within each county

5th Cycle Planning Period: 01/31/2015 – 01/31/2023

5th Cycle Projection Period: 01/01/2014 – 10/31/2022

APRs that count towards First Half Reporting Period	2015 2016 2017 2018
APRs that count towards Last Half Reporting Period	2019 2020 2021 2022

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For Bay Area Metro jurisdictions, this includes permits from 2014. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2022 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

Santa Barbara County Association of Governments (SBCAG) – includes Santa Barbara County and all cities within the County

5th Cycle Planning Period: 02/15/2015 – 02/15/2023

5th Cycle Projection Period: 01/01/2014 – 09/30/2022

APRs that count towards First Half Reporting Period	2015 2016 2017 2018
APRs that count towards Last Half Reporting Period	2019 2020 2021 2022

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For these jurisdictions, this includes permits from 2014. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 2/8ths (25%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
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After 2018 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2022 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

SB 35 Determination for the Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Barbara, Santa Clara, Solano, and Sonoma; and all cities within each county

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(Note: Jurisdictions are automatically subject to SB 35 streamlining provisions when latest Annual Progress Report (2016) Not Submitted)

COUNTY	JURISDICTION	VLI % COMPLETE	LI % COMPLETE	MOD % COMPLETE	ABOVE MOD % COMPLETE
ALAMEDA	ALAMEDA	7.4%	11.7%	6.7%	25.7%
ALAMEDA	ALAMEDA COUNTY	28.4%	36.1%	12.2%	4.7%
ALAMEDA	ALBANY	0.0%	0.0%	0.0%	100.0%
NAPA	AMERICAN CANYON	0.0%	16.7%	100.0%	90.2%
CONTRA COSTA	ANTIOCH	24.4%	0.0%	36.0%	38.7%
SAN MATEO	ATHERTON	48.6%	11.5%	6.9%	100.0%
SAN MATEO	BELMONT	0.0%	0.0%	0.0%	14.4%
MARIN	BELVEDERE	0.0%	0.0%	0.0%	0.0%
SOLANO	BENICIA	0.0%	5.6%	0.0%	5.7%
ALAMEDA	BERKELEY	16.9%	3.8%	23.5%	56.8%
CONTRA COSTA	BRENTWOOD	4.7%	41.1%	0.8%	100.0%
SAN MATEO	BRISBANE	0.0%	0.0%	6.1%	100.0%
SANTA BARBARA	BUELLTON	7.6%	9.1%	100.0%	41.1%
SAN MATEO	BURLINGAME	0.0%	0.0%	2.1%	89.0%
NAPA	CALISTOGA	0.0%	0.0%	0.0%	53.3%
SANTA CLARA	CAMPBELL	3.6%	0.7%	1.3%	54.0%
SANTA BARBARA	CARPINTERIA	84.6%	34.6%	0.0%	79.7%
CONTRA COSTA	CLAYTON	0.0%	4.0%	0.0%	0.0%
SONOMA	CLOVERDALE	64.1%	24.1%	0.0%	0.0%
SAN MATEO	COLMA	0.0%	0.0%	0.0%	0.0%
CONTRA COSTA	CONCORD	2.4%	0.7%	0.7%	6.1%
CONTRA COSTA	CONTRA COSTA COUNTY	0.0%	3.7%	38.3%	89.7%
MARIN	CORTE MADERA	31.8%	100.0%	23.1%	100.0%
SONOMA	COTATI	2.9%	16.7%	0.0%	24.2%
SANTA CLARA	CUPERTINO	0.0%	0.0%	11.7%	63.7%
SAN MATEO	DALY CITY	9.5%	11.7%	18.6%	44.2%
CONTRA COSTA	DANVILLE	0.0%	2.7%	13.7%	100.0%
SOLANO	DIXON	0.0%	0.0%	100.0%	0.0%
ALAMEDA	DUBLIN	3.3%	8.7%	0.9%	100.0%
SAN MATEO	EAST PALO ALTO	0.0%	14.8%	39.8%	0.0%
CONTRA COSTA	EL CERRITO	56.0%	9.5%	37.7%	100.0%
ALAMEDA	EMERYVILLE	1.8%	0.0%	2.7%	23.8%

SB 35 Determination for the Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Barbara, Santa Clara, Solano, and Sonoma; and all cities within each county

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
MARIN	FAIRFAX	0.0%	0.0%	0.0%	21.7%
SOLANO	FAIRFIELD	0.0%	0.5%	80.0%	50.0%
SAN MATEO	FOSTER CITY	56.1%	56.3%	18.4%	100.0%
ALAMEDA	FREMONT	3.9%	0.0%	0.0%	52.9%
SANTA CLARA	GILROY	22.0%	100.0%	6.5%	100.0%
SANTA BARBARA	GOLETA	0.0%	0.0%	2.9%	100.0%
SAN MATEO	HALF MOON BAY	100.0%	9.7%	16.7%	19.0%
ALAMEDA	HAYWARD	1.9%	0.0%	0.0%	23.9%
SONOMA	HEALDSBURG	0.0%	4.2%	50.0%	100.0%
CONTRA COSTA	HERCULES	0.0%	0.8%	0.0%	90.2%
SAN MATEO	HILLSBOROUGH	62.5%	58.8%	57.1%	33.3%
CONTRA COSTA	LAFAYETTE	1.4%	2.6%	40.0%	100.0%
MARIN	LARKSPUR	7.5%	45.0%	42.9%	100.0%
ALAMEDA	LIVERMORE	0.0%	2.9%	62.1%	50.8%
SANTA BARBARA	LOMPOC	0.0%	0.0%	46.3%	0.0%
SANTA CLARA	LOS ALTOS	1.2%	18.2%	0.9%	100.0%
SANTA CLARA	LOS GATOS	0.0%	1.8%	3.8%	34.5%
MARIN	MARIN COUNTY	18.2%	43.8%	40.5%	100.0%
SAN MATEO	MENLO PARK	19.3%	3.1%	0.0%	11.3%
MARIN	MILL VALLEY	19.5%	37.5%	30.8%	21.1%
SAN MATEO	MILLBRAE	0.0%	0.0%	0.0%	0.0%
SANTA CLARA	MILPITAS	0.0%	0.0%	0.0%	100.0%
SANTA CLARA	MONTE SERENO	39.1%	8.3%	7.7%	100.0%
CONTRA COSTA	MORAGA	0.0%	0.0%	0.0%	21.7%
SANTA CLARA	MORGAN HILL	6.2%	27.3%	12.4%	100.0%
SANTA CLARA	MOUNTAIN VIEW	5.3%	27.8%	8.9%	100.0%
NAPA	NAPA	16.8%	14.2%	2.8%	43.4%
NAPA	NAPA COUNTY	80.4%	100.0%	0.0%	29.9%
ALAMEDA	NEWARK	0.0%	0.0%	22.8%	12.8%
MARIN	NOVATO	16.2%	18.5%	2.8%	23.4%
ALAMEDA	OAKLAND	6.0%	2.1%	0.0%	34.9%
CONTRA COSTA	OAKLEY	0.0%	0.0%	100.0%	83.4%

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CONTRA COSTA	ORINDA	0.0%	0.0%	28.6%	73.3%
SAN MATEO	PACIFICA	0.0%	0.0%	2.9%	12.3%
SANTA CLARA	PALO ALTO	6.2%	13.4%	5.0%	32.2%
SONOMA	PETALUMA	0.0%	0.0%	12.4%	100.0%
ALAMEDA	PIEDMONT	12.5%	0.0%	0.0%	100.0%
CONTRA COSTA	PINOLE	0.0%	0.0%	2.3%	1.6%
CONTRA COSTA	PITTSBURG	5.9%	83.1%	100.0%	38.0%
CONTRA COSTA	PLEASANT HILL	0.0%	0.0%	2.4%	9.0%
ALAMEDA	PLEASANTON	30.7%	9.5%	2.2%	100.0%
SAN MATEO	PORTOLA VALLEY	0.0%	0.0%	20.0%	100.0%
SAN MATEO	REDWOOD CITY	1.0%	3.7%	0.0%	20.8%
CONTRA COSTA	RICHMOND	0.0%	25.9%	0.0%	13.1%
SONOMA	ROHNERT PARK	0.0%	0.0%	0.8%	0.0%
MARIN	ROSS	33.3%	0.0%	25.0%	25.0%
NAPA	SAINT HELENA	0.0%	0.0%	0.0%	100.0%
MARIN	SAN ANSELMO	39.4%	94.1%	5.3%	32.4%
SAN MATEO	SAN BRUNO	0.0%	2.5%	20.5%	12.1%
SAN MATEO	SAN CARLOS	1.0%	11.2%	7.2%	100.0%
SAN FRANCISCO	SAN FRANCISCO	9.1%	20.0%	6.0%	54.5%
SANTA CLARA	SAN JOSE	7.1%	4.3%	0.0%	53.9%
ALAMEDA	SAN LEANDRO	16.3%	11.5%	0.0%	0.7%
SAN MATEO	SAN MATEO	1.4%	4.9%	30.2%	60.1%
SAN MATEO	SAN MATEO COUNTY	0.0%	3.9%	12.7%	21.4%
CONTRA COSTA	SAN PABLO	0.0%	2.0%	6.0%	29.0%
MARIN	SAN RAFAEL	1.3%	13.5%	5.5%	29.9%
CONTRA COSTA	SAN RAMON	3.9%	29.4%	59.9%	100.0%
SANTA BARBARA	SANTA BARBARA	6.3%	5.1%	0.0%	21.0%
SANTA BARBARA	SANTA BARBARA COUNTY	30.8%	45.3%	100.0%	72.2%
SANTA CLARA	SANTA CLARA	0.2%	0.2%	5.0%	80.9%
SANTA CLARA	SANTA CLARA COUNTY	100.0%	0.0%	0.0%	100.0%
SANTA BARBARA	SANTA MARIA	2.7%	9.0%	80.0%	28.4%
SONOMA	SANTA ROSA	5.2%	20.1%	4.5%	20.3%

SB 35 Determination for the Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Barbara, Santa Clara, Solano, and Sonoma; and all cities within each county

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SANTA CLARA	SARATOGA	0.0%	18.9%	1.9%	12.9%
MARIN	SAUSALITO	34.6%	100.0%	18.8%	17.4%
SONOMA	SEBASTOPOL	0.0%	3.6%	37.9%	13.8%
SOLANO	SOLANO COUNTY	11.5%	53.3%	26.3%	37.2%
SONOMA	SONOMA	0.0%	0.0%	0.0%	19.0%
SONOMA	SONOMA COUNTY	46.8%	55.9%	81.9%	66.2%
SAN MATEO	SOUTH SAN FRANCISCO	0.0%	1.4%	8.0%	17.0%
SOLANO	SUISUN CITY	0.0%	0.0%	0.0%	28.2%
SANTA CLARA	SUNNYVALE	2.6%	0.1%	4.6%	51.5%
MARIN	TIBURON	0.0%	0.0%	0.0%	10.5%
ALAMEDA	UNION CITY	0.0%	0.0%	100.0%	11.5%
SOLANO	VACAVILLE	7.0%	34.3%	100.0%	74.9%
CONTRA COSTA	WALNUT CREEK	7.0%	4.5%	3.1%	43.8%
SONOMA	WINDSOR	0.0%	0.0%	1.5%	35.6%
SAN MATEO	WOODSIDE	13.0%	15.4%	0.0%	54.5%
NAPA	YOUNTVILLE	0.0%	0.0%	0.0%	25.0%
Solano County	DIXON	No 2016 Annual Progress Report			
Santa Barbara County	GUADALUPE	No 2016 Annual Progress Report			
Santa Barbara County	LOMPOC	No 2016 Annual Progress Report			
Santa Clara County	LOS ALTOS HILLS	No 2016 Annual Progress Report			
Contra Costa County	MARTINEZ	No 2016 Annual Progress Report			
Solano County	RIO VISTA	No 2016 Annual Progress Report			
Santa Barbara County	SOLVANG	No 2016 Annual Progress Report			
Solano County	VALLEJO	No 2016 Annual Progress Report			

Southern California Association of Governments (SCAG) – includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties, and all cities within each county

5th Cycle Planning Period: 10/15/2013⁴ – 10/15/2021

5th Cycle Projection Period: 01/01/2014 – 10/31/2021

APRs that count towards First Half Reporting Period	2014 2015 2016 2017
APRs that count towards Last Half Reporting Period	2018 2019 2020 2021

Note: Due to an anomaly in setting the SCAG planning and projection period for the 5th housing element cycle, the SCAG projection period begins after the planning period. To account for this, SCAG jurisdictions can count permits from the last two months of 2013 on their 2014 APRs. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2021 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁴ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

Sacramento Area Council of Governments (SACOG) – includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties, and all cities within each county

5th Cycle Planning Period: 10/31/2013³ – 10/31/2021

5th Cycle Projection Period: 01/01/2013 – 10/31/2021

APRs that count towards First Half Reporting Period	2014 2015 2016 2017
APRs that count towards Last Half Reporting Period	2018 2019 2020 2021

Note: Jurisdictions can count permits that occurred during the projection period before the planning period. For SACOG jurisdictions, this includes permits from 2013. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2021 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

³ When the planning period begins after July, the APR for that year is attributed to the prior cycle.

Tahoe Regional Planning Agency (TRPA) – includes the City of South Lake Tahoe

5th Cycle Planning Period: 06/15/2014 – 06/15/2022⁵

5th Cycle Projection Period: 01/01/2013 – 10/31/2021

APRs that count towards First Half Reporting Period	2014 2015 2016 2017
APRs that count towards Last Half Reporting Period	2018 2019 2020 2021

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For TRPA jurisdictions, this includes permits from 2013. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2021 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁵ When the planning period ends before July 1, the APR for that year will be attributed to the following cycle.

Butte County Association of Governments (BCAG) – includes Butte County and all cities within the County

5th Cycle Planning Period: 06/15/2014 – 06/15/2022⁶

5th Cycle Projection Period: 01/01/2014 – 06/15/2022

APRs that count towards First Half Reporting Period	2014 2015 2016 2017
APRs that count towards Last Half Reporting Period	2018 2019 2020 2021

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For BCAG jurisdictions, this includes permits from 2014, which will already be included on their 2014 APR.

SB 35 Eligibility Methodology

By January 2018:	Less than 3/8ths (37.5%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2017 APRs are due:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2021 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁶ When the planning period ends before July 1, the APR for that year will be attributed to the following cycle.

SB 35 Determination for the Counties of Butte, El Dorado, Imperial, Los Angeles, Orange, Placer, Riverside, Sacramento, San Bernardino, Sutter, Ventura, Yola, and Yuba; and all cities within each county

*These jurisdictions are in the First Half Reporting Period, including 3 years (2014-2016 APRs) of an 8-year planning period. **Less than 37.5% permitting progress toward 5th Cycle regional housing needs assessment (RHNA) for an income category is considered insufficient progress.***

Jurisdictions with insufficient progress toward Above-Moderate RHNA are subject to SB 35 streamlining for developments with 10% affordability or above. Jurisdictions with insufficient progress toward Lower RHNA (Very Low and Low) are subject to SB 35 streamlining for developments with 50% affordability or above.

(Note: Jurisdictions are automatically subject to SB 35 streamlining provisions when latest Annual Progress Report (2016) Not Submitted)

COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
LOS ANGELES	AGOURA HILLS	0.0%	0.0%	0.0%	75.6%
LOS ANGELES	ALHAMBRA	0.0%	3.6%	1.6%	37.5%
ORANGE	ALISO VIEJO	39.5%	100.0%	100.0%	0.0%
ORANGE	ANAHEIM	5.5%	2.4%	4.2%	100.0%
SAN BERNARDINO	APPLE VALLEY	0.1%	1.3%	1.8%	8.0%
PLACER	AUBURN	0.0%	0.0%	19.3%	36.8%
LOS ANGELES	BALDWIN PARK	33.1%	20.5%	0.0%	29.3%
RIVERSIDE	BANNING	0.0%	0.0%	0.0%	0.0%
SAN BERNARDINO	BARSTOW	0.0%	0.0%	0.0%	7.7%
LOS ANGELES	BELL	0.0%	0.0%	37.5%	47.6%
LOS ANGELES	BELLFLOWER	0.4%	9.8%	3.4%	50.0%
LOS ANGELES	BEVERLY HILLS	100.0%	100.0%	100.0%	*
BUTTE	BIGGS	54.2%	100.0%	0.0%	0.0%
IMPERIAL	BRAWLEY	4.4%	7.6%	10.9%	0.5%
ORANGE	BREA	0.0%	0.0%	1.8%	19.9%
ORANGE	BUENA PARK	0.0%	0.0%	0.0%	37.2%
LOS ANGELES	BURBANK	1.6%	0.0%	0.0%	27.2%
LOS ANGELES	CALABASAS	9.1%	0.0%	0.0%	28.2%
VENTURA	CAMARILLO	12.4%	18.6%	92.7%	23.1%
LOS ANGELES	CARSON	0.0%	0.0%	16.4%	11.7%
RIVERSIDE	CATHEDRAL	0.0%	0.0%	48.2%	1.2%
BUTTE	CHICO	1.4%	0.6%	0.1%	62.3%
SAN BERNARDINO	CHINO	36.3%	0.0%	0.9%	100.0%
SAN BERNARDINO	CHINO HILLS	0.0%	0.0%	100.0%	67.9%
SACRAMENTO	CITRUS HEIGHTS	0.0%	3.9%	18.5%	15.4%
RIVERSIDE	COACHELLA	0.0%	0.0%	0.0%	*
PLACER	COLFAX	0.0%	0.0%	0.0%	0.0%
SAN BERNARDINO	COLTON	0.0%	0.0%	1.7%	2.3%
RIVERSIDE	CORONA	27.6%	14.1%	43.7%	100.0%
ORANGE	COSTA MESA	0.0%	0.0%	*	*
LOS ANGELES	CUDAHY	0.0%	0.0%	0.0%	0.0%

SB 35 Determination for the Counties of Butte, El Dorado, Imperial, Los Angeles, Orange, Placer, Riverside, Sacramento, San Bernardino, Sutter, Ventura, Yola, and Yuba; and all cities within each county

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
ORANGE	DANA POINT	0.0%	0.0%	14.8%	59.9%
YOLO	DAVIS	16.9%	23.0%	18.7%	72.0%
LOS ANGELES	DOWNEY	0.0%	4.9%	51.9%	19.9%
LOS ANGELES	DUARTE	48.3%	1.9%	0.0%	0.0%
IMPERIAL	EL CENTRO	0.0%	4.7%	28.3%	6.9%
EL DORADO	EL DORADO COUNTY	4.0%	25.5%	3.9%	100.0%
LOS ANGELES	EL MONTE	0.0%	0.0%	0.0%	3.7%
SACRAMENTO	ELK GROVE	2.4%	1.0%	19.7%	69.1%
SACRAMENTO	FOLSOM	0.0%	0.0%	26.0%	46.3%
SAN BERNARDINO	FONTANA	4.4%	15.1%	0.0%	43.3%
ORANGE	FOUNTAIN VALLEY	0.0%	0.0%	0.0%	14.6%
ORANGE	FULLERTON	42.8%	28.4%	2.7%	54.5%
SACRAMENTO	GALT	0.0%	0.0%	0.0%	78.9%
ORANGE	GARDEN GROVE	0.0%	11.7%	51.1%	39.9%
LOS ANGELES	GARDENA	0.0%	0.0%	30.3%	36.4%
LOS ANGELES	GLENDALE	16.3%	19.4%	0.3%	100.0%
LOS ANGELES	GLENDORA	0.0%	0.0%	0.0%	100.0%
SAN BERNARDINO	GRAND TERRACE	0.0%	0.0%	0.0%	0.0%
LOS ANGELES	HAWTHORNE	0.0%	100.0%	30.4%	100.0%
RIVERSIDE	HEMET	0.0%	43.8%	100.0%	45.0%
SAN BERNARDINO	HESPERIA	0.0%	7.3%	50.0%	37.0%
SAN BERNARDINO	HIGHLAND	0.0%	0.0%	0.2%	0.3%
IMPERIAL	IMPERIAL COUNTY	0.0%	0.0%	66.7%	0.0%
RIVERSIDE	INDIAN WELLS	0.0%	0.0%	0.0%	100.0%
RIVERSIDE	INDIO	11.8%	0.0%	0.2%	71.9%
LOS ANGELES	INGLEWOOD	0.0%	0.0%	0.0%	7.0%
ORANGE	IRVINE	31.3%	0.1%	100.0%	100.0%
LOS ANGELES	LA CANADA FLINTRIDGE	0.0%	0.0%	0.0%	17.4%
ORANGE	LA HABRA	0.0%	3.9%	100.0%	100.0%
ORANGE	LA PALMA	0.0%	0.0%	0.0%	0.0%
ORANGE	LAGUNA BEACH	0.0%	0.0%	*	*

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
ORANGE	LAGUNA HILLS	0.0%	0.0%	*	*
RIVERSIDE	LAKE ELSINORE	0.0%	0.0%	65.6%	19.7%
ORANGE	LAKE FOREST	3.1%	37.1%	44.5%	100.0%
LOS ANGELES	LAKEWOOD	0.0%	0.0%	0.0%	43.4%
PLACER	LINCOLN	0.0%	0.0%	0.0%	14.8%
SUTTER	LIVE OAK	88.5%	51.4%	3.6%	2.1%
LOS ANGELES	LOMITA	0.0%	57.1%	100.0%	10.0%
LOS ANGELES	LONG BEACH	7.7%	2.1%	0.0%	31.8%
LOS ANGELES	LOS ANGELES	13.1%	20.9%	2.0%	100.0%
LOS ANGELES	LOS ANGELES COUNTY	2.9%	0.0%	0.0%	23.3%
LOS ANGELES	MALIBU	0.0%	0.0%	*	*
RIVERSIDE	MENIFEE	0.5%	0.3%	46.9%	28.5%
ORANGE	MISSION VIEJO	31.0%	96.6%	48.5%	100.0%
LOS ANGELES	MONROVIA	0.0%	0.0%	3.1%	100.0%
VENTURA	MOORPARK	1.7%	9.1%	8.3%	100.0%
RIVERSIDE	MORENO VALLEY	0.0%	0.0%	0.0%	7.6%
RIVERSIDE	MURRIETA	0.0%	0.0%	0.0%	3.5%
ORANGE	NEWPORT BEACH	0.0%	0.0%	0.0%	100.0%
LOS ANGELES	NORWALK	0.0%	0.0%	16.0%	8.7%
VENTURA	OJAI	0.0%	0.0%	27.1%	3.9%
SAN BERNARDINO	ONTARIO	0.0%	0.0%	42.6%	19.1%
ORANGE	ORANGE	0.0%	1.7%	12.1%	4.5%
ORANGE	ORANGE COUNTY	24.8%	26.5%	18.4%	100.0%
BUTTE	OROVILLE	0.0%	17.6%	0.0%	3.1%
VENTURA	OXNARD	11.6%	23.6%	0.3%	4.0%
RIVERSIDE	PALM DESERT	3.4%	4.7%	0.0%	11.7%
RIVERSIDE	PALM SPRINGS	0.0%	0.0%	0.0%	19.8%
LOS ANGELES	PALMDALE	0.0%	0.0%	0.0%	5.9%
BUTTE	PARADISE	0.0%	8.0%	7.5%	8.6%
LOS ANGELES	PARAMOUNT	0.0%	0.0%	0.0%	21.7%
LOS ANGELES	PASADENA	40.9%	18.4%	20.1%	100.0%

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
RIVERSIDE	PERRIS	35.0%	0.0%	29.2%	38.6%
ORANGE	PLACENTIA	0.0%	0.0%	34.4%	50.2%
PLACER	PLACER COUNTY	2.6%	8.6%	1.8%	66.7%
EL DORADO	PLACERVILLE	0.0%	0.0%	47.8%	71.2%
SACRAMENTO	RANCHO CORDOVA	0.0%	0.0%	0.0%	29.6%
SAN BERNARDINO	RANCHO CUCAMONGA	0.0%	0.0%	0.0%	100.0%
LOS ANGELES	RANCHO PALOS VERDES	50.0%	0.0%	0.0%	100.0%
ORANGE	RANCHO ST. MARGARITA	0.0%	0.0%	*	*
SAN BERNARDINO	RIALTO	0.0%	0.0%	0.0%	4.7%
RIVERSIDE	RIVERSIDE	0.3%	0.0%	0.0%	3.1%
RIVERSIDE	RIVERSIDE COUNTY	1.1%	1.1%	9.5%	15.2%
PLACER	ROCKLIN	0.0%	0.0%	85.5%	76.7%
LOS ANGELES	ROSEMEAD	0.0%	0.0%	0.0%	0.0%
PLACER	ROSEVILLE	2.2%	1.8%	74.4%	60.6%
SACRAMENTO	SACRAMENTO	6.3%	16.1%	67.1%	18.3%
SACRAMENTO	SACRAMENTO COUNTY	2.4%	5.3%	23.9%	18.5%
SAN BERNARDINO	SAN BERNARDINO	5.8%	2.6%	0.0%	0.7%
VENTURA	SAN BUENAVENTURA	8.9%	2.0%	6.4%	24.0%
LOS ANGELES	SAN DIMAS	0.0%	0.0%	0.0%	14.5%
LOS ANGELES	SAN FERNANDO	50.9%	43.8%	0.0%	37.9%
LOS ANGELES	SAN GABRIEL	1.3%	0.0%	40.9%	26.9%
RIVERSIDE	SAN JACINTO	0.0%	0.0%	1.8%	9.8%
ORANGE	SAN JUAN CAPISTRANO	0.0%	1.9%	1.7%	100.0%
LOS ANGELES	SAN MARINO	0.0%	0.0%	40.0%	*
ORANGE	SANTA ANA	12.8%	26.2%	35.1%	100.0%
LOS ANGELES	SANTA FE SPRINGS	0.0%	0.0%	0.0%	100.0%
LOS ANGELES	SIGNAL HILL	100.0%	100.0%	7.1%	4.3%
VENTURA	SIMI VALLEY	0.0%	0.5%	6.6%	48.5%
ORANGE	STANTON	0.0%	0.0%	0.0%	68.6%
RIVERSIDE	TEMECULA	0.0%	0.0%	0.0%	100.0%
VENTURA	THOUSAND OAKS	20.2%	3.4%	100.0%	100.0%

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
ORANGE	TUSTIN	0.4%	45.1%	49.1%	100.0%
SAN BERNARDINO	UPLAND	0.0%	0.0%	0.0%	31.1%
VENTURA	VENTURA COUNTY	7.3%	20.2%	19.0%	21.6%
LOS ANGELES	WALNUT	0.0%	0.0%	0.6%	92.8%
LOS ANGELES	WEST COVINA	0.0%	0.0%	0.0%	100.0%
LOS ANGELES	WEST HOLLYWOOD	100.0%	100.0%	100.0%	100.0%
YOLO	WEST SACRAMENTO	9.7%	2.0%	54.4%	5.1%
ORANGE	WESTMINSTER	0.0%	0.0%	*	*
LOS ANGELES	WHITTIER	0.0%	0.0%	100.0%	10.3%
RIVERSIDE	WILDOMAR	0.0%	0.0%	3.3%	44.3%
YOLO	WINTERS	0.0%	0.0%	1.7%	0.0%
YOLO	WOODLAND	11.8%	6.6%	39.3%	58.6%
YOLO	YOLO COUNTY	10.8%	2.7%	3.7%	2.6%
ORANGE	YORBA LINDA	33.8%	12.4%	0.0%	46.7%
SUTTER	YUBA CITY	0.3%	1.6%	19.5%	8.9%
SAN BERNARDINO	YUCAIPA	5.4%	6.4%	0.0%	16.8%
SAN BERNARDINO	YUCCA VALLEY	0.0%	0.0%	0.0%	8.5%
San Bernardino County	ADELANTO	No 2016 Annual Progress Report			
Los Angeles County	ARCADIA	No 2016 Annual Progress Report			
Los Angeles County	ARTESIA	No 2016 Annual Progress Report			
Los Angeles County	AVALON	No 2016 Annual Progress Report			
Los Angeles County	AZUSA	No 2016 Annual Progress Report			
Riverside County	BEAUMONT	No 2016 Annual Progress Report			
Los Angeles County	BELL GARDENS	No 2016 Annual Progress Report			
San Bernardino County	BIG BEAR LAKE	No 2016 Annual Progress Report			
Butte County	BIGGS	No 2016 Annual Progress Report			
Riverside County	BLYTHE	No 2016 Annual Progress Report			
Los Angeles County	BRADBURY	No 2016 Annual Progress Report			
Orange County	BREA	No 2016 Annual Progress Report			

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
Butte County	BUTTE COUNTY	No 2016 Annual Progress Report			
Imperial County	CALEXICO	No 2016 Annual Progress Report			
Riverside County	CALIMESA	No 2016 Annual Progress Report			
Imperial County	CALIPATRIA	No 2016 Annual Progress Report			
Riverside County	CANYON LAKE	No 2016 Annual Progress Report			
Los Angeles County	CERRITOS	No 2016 Annual Progress Report			
San Bernardino County	CHINO	No 2016 Annual Progress Report			
Los Angeles County	CLAREMONT	No 2016 Annual Progress Report			
Riverside County	COACHELLA	No 2016 Annual Progress Report			
Placer County	COLFAX	No 2016 Annual Progress Report			
Los Angeles County	COMMERCE	No 2016 Annual Progress Report			
Los Angeles County	COMPTON	No 2016 Annual Progress Report			
Los Angeles County	COVINA	No 2016 Annual Progress Report			
Los Angeles County	CULVER CITY	No 2016 Annual Progress Report			
Orange County	CYPRESS	No 2016 Annual Progress Report			
Riverside County	DESERT HOT SPRINGS	No 2016 Annual Progress Report			
Los Angeles County	DIAMOND BAR	No 2016 Annual Progress Report			
Los Angeles County	DUARTE	No 2016 Annual Progress Report			
Riverside County	EASTVALE	No 2016 Annual Progress Report			
Los Angeles County	EL SEGUNDO	No 2016 Annual Progress Report			
Ventura County	FILLMORE	No 2016 Annual Progress Report			
Los Angeles County	GARDENA	No 2016 Annual Progress Report			
Butte County	GRIDLEY	No 2016 Annual Progress Report			
Los Angeles County	HAWAIIAN GARDENS	No 2016 Annual Progress Report			
Los Angeles County	HERMOSA BEACH	No 2016 Annual Progress Report			
Los Angeles County	HIDDEN HILLS	No 2016 Annual Progress Report			
San Bernardino County	HIGHLAND	No 2016 Annual Progress Report			
Imperial County	HOLTVILLE	No 2016 Annual Progress Report			

SB 35 Determination for the Counties of Butte, El Dorado, Imperial, Los Angeles, Orange, Placer, Riverside, Sacramento, San Bernardino, Sutter, Ventura, Yola, and Yuba; and all cities within each county

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(Note: Jurisdictions are automatically subject to SB 35 streamlining provisions when latest Annual Progress Report (2016) Not Submitted)

COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
Orange County	HUNTINGTON BEACH	No 2016 Annual Progress Report			
Los Angeles County	HUNTINGTON PARK	No 2016 Annual Progress Report			
Imperial County	IMPERIAL	No 2016 Annual Progress Report			
Los Angeles County	INDUSTRY	No 2016 Annual Progress Report			
Los Angeles County	IRWINDALE	No 2016 Annual Progress Report			
Sacramento County	ISLETON	No 2016 Annual Progress Report			
Riverside County	JURUPA VALLEY	No 2016 Annual Progress Report			
Orange County	LA HABRA	No 2016 Annual Progress Report			
Los Angeles County	LA HABRA HEIGHTS	No 2016 Annual Progress Report			
Los Angeles County	LA MIRADA	No 2016 Annual Progress Report			
Los Angeles County	LA PUENTE	No 2016 Annual Progress Report			
Riverside County	LA QUINTA	No 2016 Annual Progress Report			
Los Angeles County	LA VERNE	No 2016 Annual Progress Report			
Orange County	LAGUNA BEACH	No 2016 Annual Progress Report			
Orange County	LAGUNA NIGUEL	No 2016 Annual Progress Report			
Orange County	LAGUNA WOODS	No 2016 Annual Progress Report			
Los Angeles County	LANCASTER	No 2016 Annual Progress Report			
Los Angeles County	LAWNDALE	No 2016 Annual Progress Report			
San Bernardino County	LOMA LINDA	No 2016 Annual Progress Report			
Placer County	LOOMIS	No 2016 Annual Progress Report			
Orange County	LOS ALAMITOS	No 2016 Annual Progress Report			
Los Angeles County	LYNWOOD	No 2016 Annual Progress Report			
Los Angeles County	MALIBU	No 2016 Annual Progress Report			
Los Angeles County	MANHATTAN BEACH	No 2016 Annual Progress Report			
Yuba County	MARYSVILLE	No 2016 Annual Progress Report			
Los Angeles County	MAYWOOD	No 2016 Annual Progress Report			
San Bernardino County	MONTCLAIR	No 2016 Annual Progress Report			
Los Angeles County	MONTEBELLO	No 2016 Annual Progress Report			

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
Los Angeles County	MONTEREY PARK	No 2016 Annual Progress Report			
Riverside County	MURRIETA	No 2016 Annual Progress Report			
San Bernardino County	NEEDLES	No 2016 Annual Progress Report			
Riverside County	NORCO	No 2016 Annual Progress Report			
Riverside County	PALM DESERT	No 2016 Annual Progress Report			
Los Angeles County	PALMDALE	No 2016 Annual Progress Report			
Los Angeles County	PALOS VERDES ESTATES	No 2016 Annual Progress Report			
Los Angeles County	PICO RIVERA	No 2016 Annual Progress Report			
Los Angeles County	POMONA	No 2016 Annual Progress Report			
Ventura County	PORT HUENEME	No 2016 Annual Progress Report			
Riverside County	RANCHO MIRAGE	No 2016 Annual Progress Report			
San Bernardino County	REDLANDS	No 2016 Annual Progress Report			
Los Angeles County	REDONDO BEACH	No 2016 Annual Progress Report			
San Bernardino County	RIALTO	No 2016 Annual Progress Report			
Los Angeles County	ROLLING HILLS	No 2016 Annual Progress Report			
Los Angeles County	ROLLING HILLS ESTATES	No 2016 Annual Progress Report			
San Bernardino County	SAN BERNARDINO	No 2016 Annual Progress Report			
San Bernardino County	SAN BERNARDINO COUN	No 2016 Annual Progress Report			
Orange County	SAN CLEMENTE	No 2016 Annual Progress Report			
Los Angeles County	SAN GABRIEL	No 2016 Annual Progress Report			
Los Angeles County	SANTA CLARITA	No 2016 Annual Progress Report			
Los Angeles County	SANTA MONICA	No 2016 Annual Progress Report			
Ventura County	SANTA PAULA	No 2016 Annual Progress Report			
Orange County	SEAL BEACH	No 2016 Annual Progress Report			
Los Angeles County	SIERRA MADRE	No 2016 Annual Progress Report			
Los Angeles County	SOUTH EL MONTE	No 2016 Annual Progress Report			
Los Angeles County	SOUTH GATE	No 2016 Annual Progress Report			
El Dorado County	SOUTH LAKE TAHOE	No 2016 Annual Progress Report			

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
Los Angeles County	SOUTH PASADENA	No 2016 Annual Progress Report			
Sutter County	SUTTER COUNTY	No 2016 Annual Progress Report			
Riverside County	TEMECULA	No 2016 Annual Progress Report			
Los Angeles County	TEMPLE CITY	No 2016 Annual Progress Report			
Los Angeles County	TORRANCE	No 2016 Annual Progress Report			
San Bernardino County	TWENTYNINE PALMS	No 2016 Annual Progress Report			
Los Angeles County	VERNON	No 2016 Annual Progress Report			
San Bernardino County	VICTORVILLE	No 2016 Annual Progress Report			
Orange County	VILLA PARK	No 2016 Annual Progress Report			
Los Angeles County	WESTLAKE VILLAGE	No 2016 Annual Progress Report			
Imperial County	WESTMORLAND	No 2016 Annual Progress Report			
Yuba County	WHEATLAND	No 2016 Annual Progress Report			
Yolo County	WINTERS	No 2016 Annual Progress Report			
Yuba County	YUBA COUNTY	No 2016 Annual Progress Report			
San Bernardino County	YUCAIPA	No 2016 Annual Progress Report			

San Diego Association of Governments (SANDAG)-includes San Diego County and all cities within the County

5th Cycle Planning Period: 04/30/2013 – 04/30/2021

5th Cycle Projection Period: 01/01/2010 – 12/31/2020

APRs that count towards First Half Reporting Period	2013 2014 2015 2016
APRs that count towards Last Half Reporting Period	2017 2018 2019 2020

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For SANDAG jurisdictions, this includes permits from 2010, 2011, and 2012, which can be counted on 2013 APRs. For assistance in counting these units contact APR@hcd.ca.gov.

SB 35 Eligibility Methodology

By January 2018:	Less than 4/8ths (50%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2020 APRs are due:	Less than 8/8ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

SB 35 Determination for the Counties of San Diego; and all cities within the County

These jurisdictions are in the First Half Reporting Period, including 4 year (2013-2016 APRs) of an 8-year planning period. **Less than 50% permitting progress toward 5th Cycle regional housing needs assessment (RHNA) for an income category is considered insufficient progress.**

Jurisdictions with insufficient progress toward Above-Moderate RHNA are subject to SB 35 streamlining for developments with 10% affordability or above. Jurisdictions with insufficient progress toward Lower RHNA (Very Low and Low) are subject to SB 35 streamlining for developments with 50% affordability or above.

(Note: Jurisdictions are automatically subject to SB 35 streamlining provisions when latest Annual Progress Report (2016) Not Submitted)

COUNTY	JURISDICTION	VLI % COMPLETE	LI % COMPLETE	MOD % COMPLETE	ABOVE MOD % COMPLETE
SAN DIEGO	CARLSBAD	0.8%	26.0%	5.3%	46.1%
SAN DIEGO	CHULA VISTA	1.4%	8.0%	3.8%	63.0%
SAN DIEGO	CORONADO	0.0%	0.0%	0.0%	100.0%
SAN DIEGO	DEL MAR	0.0%	0.0%	0.0%	61.8%
SAN DIEGO	EL CAJON	3.3%	0.6%	1.1%	5.7%
SAN DIEGO	ENCINITAS	0.2%	3.8%	0.2%	35.3%
SAN DIEGO	ESCONDIDO	0.7%	5.1%	0.1%	20.8%
SAN DIEGO	IMPERIAL BEACH	4.8%	54.2%	11.1%	40.8%
SAN DIEGO	LA MESA	0.0%	0.6%	0.0%	25.3%
SAN DIEGO	LEMON GROVE	74.0%	96.6%	33.3%	79.8%
SAN DIEGO	NATIONAL CITY	9.7%	30.6%	14.4%	28.3%
SAN DIEGO	OCEANSIDE	5.4%	4.7%	5.8%	13.5%
SAN DIEGO	POWAY	0.0%	0.0%	0.0%	9.4%
SAN DIEGO	SAN DIEGO	5.5%	10.8%	0.0%	61.6%
SAN DIEGO	SAN DIEGO COUNTY	1.2%	13.9%	12.3%	21.7%
SAN DIEGO	SAN MARCOS	10.5%	9.7%	6.8%	99.1%
SAN DIEGO	SANTEE	0.0%	0.3%	0.0%	25.7%
SAN DIEGO	SOLANA BEACH	0.0%	4.6%	0.0%	18.3%
SAN DIEGO	VISTA	27.4%	15.4%	0.4%	100.0%
SAN DIEGO	OCEANSIDE	No 2016 Annual Progress Report			

Counties of Alpine, Amador, Calaveras, Colusa, Del Norte, Glenn, Humboldt, Inyo, Lake, Lassen, Mariposa, Mendocino, Modoc, Mono, Nevada, Plumas, San Luis Obispo, Shasta, Sierra, Siskiyou, Tehama, Trinity, and Tuolumne; and all cities within each county

5th Cycle Planning Period: 06/30/2014 – 06/30/2019

5th Cycle Projection Period: 01/01/2014 – 06/30/2019⁷

APRs that count towards First Half Reporting Period	2014 2015 2016
APRs that count towards Last Half Reporting Period	2017 2018

Note: Jurisdictions can count permits that occurred during the projection period before the planning period began on the first APR of the planning period. For the jurisdictions noted above, this includes permits from 2014, which will already be included on their 2014 APR.

SB 35 Eligibility Methodology

By January 2018:	Less than 3/5ths (60%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”
After 2018 APRs are due:	Less than 5/5ths (100%) permitting progress toward 5 th Cycle regional housing needs assessment for an income category, qualifies as “fewer units of [an income category of] housing approved than were required for the regional housing needs assessment cycle for that reporting period.”

⁷ When the planning period ends before July 1, the APR for that year will be attributed to the following cycle.

SB 35 Determination for the Counties of Alpine, Amador, Calaveras, Colusa, Del Norte, Glenn, Humboldt, Inyo, Lake, Lassen, Mariposa, Mendocino, Modoc, Mono, Nevada, Plumas, San Luis Obispo, Shasta, Sierra, Siskiyou, Tehama, Trinity, Tuolumne; and all cities within each county

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COUNTY	JURISDICTION	VLI % COMPLE TE	LI % COMPLE TE	MOD % COMPLE TE	ABOVE MOD % COMPLE TE
SHASTA	ANDERSON	0.0%	19.0%	100.0%	16.9%
HUMBOLDT	ARCATA	50.6%	8.9%	87.1%	10.0%
SAN LUIS OBISPO	ATASCADERO	49.0%	41.9%	100.0%	95.1%
INYO	BISHOP	0.0%	0.0%	0.0%	0.0%
COLUSA	COLUSA COUNTY	2.8%	4.4%	75.8%	19.0%
DEL NORTE	DEL NORTE COUNTY	16.7%	13.5%	36.7%	35.8%
SISKIYOU	DORRIS	0.0%	50.0%	50.0%	0.0%
HUMBOLDT	EUREKA	0.0%	57.3%	7.7%	8.0%
MENDOCINO	FORT BRAGG	0.0%	40.0%	0.0%	33.3%
NEVADA	GRASS VALLEY	10.7%	84.1%	1.0%	2.3%
SAN LUIS OBISPO	GROVER BEACH	0.0%	19.2%	0.0%	91.3%
HUMBOLDT	HUMBOLDT COUNTY	10.0%	12.5%	54.1%	13.7%
INYO	INYO COUNTY	0.0%	0.0%	0.0%	15.3%
AMADOR	JACKSON	0.0%	0.0%	100.0%	0.0%
MONO	MAMMOTH LAKES	0.0%	0.0%	0.0%	100.0%
MARIPOSA	MARIPOSA COUNTY	0.0%	0.0%	53.0%	*
MENDOCINO	MENDOCINO COUNTY	0.0%	0.0%	100.0%	100.0%
MONO	MONO COUNTY	0.0%	100.0%	100.0%	100.0%
SISKIYOU	MOUNT SHASTA	0.0%	0.0%	0.0%	5.3%
NEVADA	NEVADA COUNTY	23.6%	43.7%	55.3%	63.4%
GLENN	ORLAND	0.0%	0.0%	71.4%	0.0%
SAN LUIS OBISPO	PASO ROBLES	85.4%	57.1%	52.9%	77.6%
PLUMAS	PLUMAS COUNTY	0.0%	0.0%	33.3%	100.0%
TEHAMA	RED BLUFF	0.0%	50.0%	3.3%	0.0%
SHASTA	REDDING	2.0%	4.0%	6.6%	13.9%
SAN LUIS OBISPO	SAN LUIS OBISPO	65.6%	100.0%	27.2%	100.0%
SAN LUIS OBISPO	SAN LUIS OBISPO COUNTY	6.8%	23.2%	29.5%	100.0%
SHASTA	SHASTA LAKE	28.1%	61.9%	34.8%	0.0%
TUOLUMNE	SONORA	0.0%	62.5%	31.6%	9.5%

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AMADOR	SUTTER CREEK	0.0%	0.0%	100.0%	100.0%
TEHAMA	TEHAMA COUNTY	14.3%	39.5%	15.7%	24.9%
TUOLUMNE	TUOLUMNE COUNTY	0.0%	5.4%	0.0%	17.1%
MENDOCINO	UKIAH	100.0%	100.0%	0.0%	5.0%
GLENN	WILLOWS	100.0%	18.2%	9.1%	0.0%
SISKIYOU	YREKA	0.0%	0.0%	10.5%	0.0%
Alpine County	ALPINE COUNTY	No 2016 Annual Progress Report			
Modoc County	ALTURAS	No 2016 Annual Progress Report			
Amador County	AMADOR	No 2016 Annual Progress Report			
Amador County	AMADOR COUNTY	No 2016 Annual Progress Report			
Calaveras County	ANGELS CAMP	No 2016 Annual Progress Report			
San Luis Obispo County	ARROYO GRANDE	No 2016 Annual Progress Report			
Inyo County	BISHOP	No 2016 Annual Progress Report			
Humboldt County	BLUE LAKE	No 2016 Annual Progress Report			
Calaveras County	CALAVERAS COUNTY	No 2016 Annual Progress Report			
Lake County	CLEARLAKE	No 2016 Annual Progress Report			
Colusa County	COLUSA	No 2016 Annual Progress Report			
Tehama County	CORNING	No 2016 Annual Progress Report			
Del Norte County	CRESCENT CITY	No 2016 Annual Progress Report			
Siskiyou County	DORRIS	No 2016 Annual Progress Report			
Siskiyou County	DUNSMUIR	No 2016 Annual Progress Report			
Siskiyou County	ETNA	No 2016 Annual Progress Report			
Humboldt County	EUREKA	No 2016 Annual Progress Report			
Humboldt County	FERNDALE	No 2016 Annual Progress Report			
Mendocino County	FORT BRAGG	No 2016 Annual Progress Report			
Siskiyou County	FORT JONES	No 2016 Annual Progress Report			

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Humboldt County	FORTUNA	No 2016 Annual Progress Report			
Glenn County	GLENN COUNTY	No 2016 Annual Progress Report			
Humboldt County	HUMBOLDT COUNTY	No 2016 Annual Progress Report			
Amador County	IONE	No 2016 Annual Progress Report			
Amador County	JACKSON	No 2016 Annual Progress Report			
Lake County	LAKE COUNTY	No 2016 Annual Progress Report			
Lake County	LAKEPORT	No 2016 Annual Progress Report			
Lassen County	LASSEN COUNTY	No 2016 Annual Progress Report			
Sierra County	LOYALTON	No 2016 Annual Progress Report			
Mendocino County	MENDOCINO COUNTY	No 2016 Annual Progress Report			
Modoc County	MODOC COUNTY	No 2016 Annual Progress Report			
Siskiyou County	MONTAGUE	No 2016 Annual Progress Report			
San Luis Obispo County	MORRO BAY	No 2016 Annual Progress Report			
Siskiyou County	MOUNT SHASTA	No 2016 Annual Progress Report			
Nevada County	NEVADA CITY	No 2016 Annual Progress Report			
Glenn County	ORLAND	No 2016 Annual Progress Report			
San Luis Obispo County	PISMO BEACH	No 2016 Annual Progress Report			
Amador County	PLYMOUTH	No 2016 Annual Progress Report			
Mendocino County	POINT ARENA	No 2016 Annual Progress Report			
Plumas County	PORTOLA	No 2016 Annual Progress Report			
Tehama County	RED BLUFF	No 2016 Annual Progress Report			
Humboldt County	RIO DELL	No 2016 Annual Progress Report			
Shasta County	SHASTA COUNTY	No 2016 Annual Progress Report			
Sierra County	SIERRA COUNTY	No 2016 Annual Progress Report			
Siskiyou County	SISKIYOU COUNTY	No 2016 Annual Progress Report			
Lassen County	SUSANVILLE	No 2016 Annual Progress Report			

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Tehama County	TEHAMA	No 2016 Annual Progress Report			
Humboldt County	TRINIDAD	No 2016 Annual Progress Report			
Trinity County	TRINITY COUNTY	No 2016 Annual Progress Report			
Nevada County	TRUCKEE	No 2016 Annual Progress Report			
Siskiyou County	TULELAKE	No 2016 Annual Progress Report			
Siskiyou County	WEED	No 2016 Annual Progress Report			
Colusa County	WILLIAMS	No 2016 Annual Progress Report			
Mendocino County	WILLITS	No 2016 Annual Progress Report			