Letter 20

From: notifications@typeform.com
To: Bobby Safikhani; David Gillig; John Keho; Jennifer Alkire
Subject: Typeform: New response for Planning Commission Public Comment Form 11-18-21
Date: Thursday, November 18, 2021 12:29:23 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Your typeform Planning Commission Public Comment Form 11-18-21 has a new response:

- **Please provide your name.**
  Binnur Karaevli

- **Hi Binnur Karaevli. Please provide your city of residence.**
  8562 West Knoll Drive

- **Please provide your address and phone number.**
  8562 West Knoll Dr #7, WeHo 90069, 310-849-1531

- **Would you like to comment during public comment or on a particular agenda item?**
  PUBLIC COMMENT

- **Please provide your comment for public comment.**
  The draft EIR that was circulated on October 14, 2021 is very different than the original planning. There are more apartment in the project, it also now covers the houses on West Knoll Dr. In fact this revised plan is a whole new one? Shouldn't it have new geotechnical analysis, analysis of the soil and the water table analysis?

1

Typeform sent you this email on behalf of a typeform creator. We aren't responsible for its content. If you suspect abuse, like suspicious links, please report it here.

Letter 20

COMMENTER: Binnur Karaevli

DATE: November 18, 2021

Response 20.1

The commenter states that the Recirculated Draft EIR is different than previous versions of the Draft EIR, in that the project contains more apartment units and covers more area than the original project. The commenter asks whether the Recirculated Draft EIR should have new geotechnical, soil, and groundwater analyses.

The Recirculated Draft EIR compares the prior project with the current revised project in Section 1.1, Environmental Impact Report Background, including Table 1-3, Comparison of 2016 Draft EIR Project with Current Revised Project. As discussed in Section 4.2, *Geology and Hydrology,* of the recirculated Draft EIR, a geotechnical evaluation of the site was conducted for the proposed project by GeoDesign, Inc. dated July 23, 2018 and revised October 31, 2019 to address the currently proposed project. Updated recommendations were also prepared by Zadoorian & Associates, Inc. dated July 9, 2019. Please also see Responses 9.1 and 10.4. In addition, updated borings were drilled in February 2022 and found that groundwater levels were consistent with previous groundwater levels encountered in previous borings. Please see Response 17.1. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Letter 21

Karly Kaufman

From: Mark Lehman <mark@marklehmanesq.com>

Sent: Thursday, November 18, 2021 1:12 PM
To: David Gillig; Laurie Yelton
Subject: Item 11A on Tonight's Planning Commission Agenda - DEIR

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Laurie Yelton and Planning Commissioners:

I am a local long-term resident on Westbourne Drive and particularly aware of the very high existing groundwater problems we have in this area of the city. Our condo building has recently had to install 2 new additional sump pumps to address water intrusion into our building and garage, on top of several other sump pumps throughout our property to attempt to remove and direct the groundwater into the city's sewer and drainage system

The water table is so high that West Knoll and Westbourne have had long term issues with groundwater seeping up to the street and sidewalk surface and pouring down our street. As a result, the City Council in July of this year approved a nearly $500,000 project to 1

"**reconstruct the street with a subsurface drainage system to eliminate the groundwater that has been rising and seeping through cracks in the roadway pavement. The groundwater is currently reaching the surface of the pavement and washing down the block**"

The site of this work to be done by the City is within 1 block of the subject project and it is safe to assume that the same or similar high groundwater issues exist at or near the project site.

The community has raised issues with the high groundwater problems in the area since this project was first proposed and even the DEIR itself acknowledges the issue and its potential impacts.

In particular please review the Geology and Hydrology discussion on pages 4-2-1 through 4-2-11 of the latest DEIR:

On page 4-2-1, the report says that explorations of the site "found groundwater at 30-49 feet below ground surface", which seems contrary to the city's own studies just a block over at West Knoll and Westbourne where groundwater is percolating up to the ground surface already.

2 On page 4-2-4 the report finds that "As the lowest finish floor level for the proposed project is approximately at the historical high (water) levels at the site, waterproofing of the mat foundation is required..." The report goes on to discuss the waterproofing system recommended to protect the subterranean parking lot to prevent water intrusion into the building, but it does not discuss where that groundwater would be diverted to and/or what potential impacts that water might have on areas and properties surrounding the site.

I also see a factual error on page 4.2-11 discussing potential groundwater Cumulative Impacts of various construction projects in the vicinity, where it mistakenly says that **none of the planned or pending projects are located within 1/4 mile of the project site** and that therefor **simultaneous construction of multiple projects within the immediate vicinity would not occur**; however, that statement ignores
3 current projects under construction on Westbourne and Hancock and at least 1 recently approved project (if not 2) nearby on West Knoll. Given that there are multiple nearby projects that are or may be under construction simultaneously with this project, further study of how all that construction might cumulatively impact groundwater are warranted.

4 I also refer the City and Planning Commissioners to the initial study's discussion of the groundwater issues;

Please see pages 24- 25, in which the study finds that there is a **Potentially Significant Impact** in that the **project may "interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin"**

Surprisingly directly below that statement the initial study finds that there would be Less than Significant Impact from the project "altering the existing drainage pattern of the site or area..." I don't know where the studies or data might be to support this contradictory conclusion or how that conclusion can be made when the EIR itself elsewhere acknowledges potential groundwater drainage issues.

Further on page 25 of the initial study it states that:

4 cont.

"The project site is located in an area where groundwater has been found at depths of 30-49 feet below ground surface (GeoDesign, 2011). The proposed project involves a subterranean parking garage. **Excavation and use of the subterranean parking garage may impact groundwater resources. Impacts related to intrusion of site structures into the groundwater table would be potentially significant and this will be further analyzed in an EIR."**

I have thus far been unable to locate the further analysis of the groundwater impacts in the DEIR and respectfully respect that the City and Planning Commissioners specifically ask for that further analysis to assure the city and community that groundwater impacts of the project will be adequately mitigated.

5 Finally, given the recent high profile Surfside, Florida building collapse and tragedy which similarly involved the local high water table, how it impacted the condominium tower failure and how nearby construction may also have significantly contributed to the disaster, we respectfully request that the city require additional study of groundwater impacts and focus specifically on impacts not only on this project but the surrounding

5 cont. community. None of us want to see a similar tragedy take place in West Hollywood.

Thank you.

Mark

Mark E. Lehman
Law Offices of Mark E. Lehman
9255 Sunset Blvd., Suite 730
West Hollywood, CA 90069
Phone: (310) 919-4180
Cell: (310) 418-1559
Fax: (310) 276-2513
E-mail: Mark@MarkLehmanEsq.com
www.MarkLehmanEsq.com

This e-mail is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521 and is legally privileged and protected. The information contained in this communication is confidential and if directed to a client, or between lawyers or experts for a client, is intended by the sender to be subject to the attorney-client and attorney work product privileges. This information may constitute inside information, may be subject to further restrictions on disclosure by contract or other binding agreement, and is intended only for the use of the intended recipient. This communication is the property of the Law Offices of Mark E. Lehman and/or its clients. Any unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to mark@marklehmanesq.com, and then destroy this communication and all copies thereof, including all attachments.

Letter 21

COMMENTER: Mark E. Lehman

DATE: November 18, 2021

Response 21.1

The commenter states that he is a resident in the vicinity of the proposed project expresses concern about issues with a high groundwater table in the area and groundwater seepage into the sidewalk. The commenter references a project that City Council approved in July 2021 to reconstruct the street with a subsurface drainage system to eliminate groundwater seepage. The commenter states the site of this work is within 1 block of the project site and they assume that high groundwater issues also exist at the project site.

Please see Response 17.1. Response 21.2

The commenter refers to pages 4.2-1 through 4.2-11 of the Recirculated Draft EIR, which contains a description of the existing groundwater setting and an analysis of potential impacts to groundwater caused by the proposed project. The commenter claims that the groundwater levels described in the Recirculated Draft EIR contradict the findings regarding groundwater levels described in the West Hollywood City Council staff report dated July 21, 2021. The commenter also states a concern regarding the waterproofing described in Impact GEO-3, and states that this impact does not describe how the groundwater would be diverted in this waterproofing process.

The Recirculated Draft EIR accurately describes groundwater levels. As shown in table in Response 17.1, groundwater levels at the site have remained stable and more recent groundwater explorations encountered groundwater at levels consistent with those described in the Recirculated Draft EIR. As discussed in Section 4.2, *Geology and Hydrology,* of the Recirculated Draft EIR, although it is unlikely groundwater will reach the lowest foundation level, because the historic high groundwater table is at the level of the foundation the building has been designed to assume groundwater could be at the historic high level. The building mat foundation and walls below grade will be designed to resist the nominal hydrostatic pressure that would develop in the event that the groundwater rises to the historic high levels. The design methods for this process are established in the California Building Code and are commonly employed in similar projects throughout the City of West Hollywood, Los Angeles, and Beverly Hills. The design of this is to prevent groundwater seepage into the building, but would not create pressure such that adjacent structures would be affected. Diversion of groundwater would not occur, rather, the project foundation would be designed to ensure that groundwater intrusion does not occur. Please also see Response 10.4.

Response 21.3

The commenter refers to the Cumulative Impacts discussion within Section 4.2, *Geology and Hydrology*, and claims that the statement "none of the planned or pending projects are located with ¼ mile of the project site" is incorrect. The commenter states that there are multiple nearby projects that could be under construction simultaneously while the proposed project is under

construction. The commenter states that this simultaneous construction warrants further groundwater analysis.

The related projects list was compiled at the time of the NOP and updated in 2019. According to CEQA Guidelines Section 15125, "an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published…" The NOP and Initial Study for the proposed project were published on April 12, 2013. Although not required since the NOP was issued in 2013, the cumulative projects list was updated in 2019 as part of Fehr & Peers transportation report (the related projects list is included in Appendix D of Fehr & Peers report, which is Appendix G of the Recirculated Draft EIR). Therefore, the cumulative impact analysis and conclusions based on the cumulative setting described in Section 3.0, *Environmental Setting*, of the Recirculated Draft EIR are appropriate. Further, construction projects would be subject to applicable requirements designed to avoid off-site impacts, such as Section 9.70.040 of the WHMC and Regional Water Quality Control Board Groundwater Permit requirements, such that multiple nearby construction projects would not create groundwater impacts.

Response 21.4

The commenter refers to pages 24 and 25 of the Initial Study conducted for the proposed project (Appendix A) and refers to the Potentially Significant Impacts determinations for Environmental Checklist questions (b) and (e). The commenter states he has been unable locate further analysis related to these items in the Recirculated Draft EIR, and asks that the City ensure that analysis has been completed and any groundwater impacts are properly mitigated.

Impacts related to groundwater are analyzed in detail in Section 4.2, *Geology and Hydrology,* of the Recirculated Draft EIR. Impacts related to temporary dewatering during construction were found to be less than significant with implementation of mitigation. Because the proposed structure would be waterproofed in accordance with CBC requirements, no permanent dewatering would be needed in the event that the groundwater table rises above the bottom of the building. Because permanent dewatering would not be required, no impacts related to groundwater withdrawal would occur.

Response 21.5

The commenter refers to the Champlain Towers condominium collapse in Surfside, Florida, and describes how a high groundwater table and construction adjacent to the condominiums may have contributed to the building's collapse. The commenter asks the City to conduct additional groundwater studies to determine the potential impacts of the building's construction to the surrounding community.

Please see Response 17.1.

Letter 22

From: notifications@typeform.com
To: Bobby Safikhani; David Gillig; John Keho; Jennifer Alkire
Subject: Typeform: New response for Planning Commission Public Comment Form 11-18-21
Date: Thursday, November 18, 2021 1:56:11 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Your typeform Planning Commission Public Comment Form 11-18-21 has a new response:

- **Please provide your name.**
  Justin D

- **Hi Justin D. Please provide your city of residence.**
  West Hollywood

- **Would you like to comment during public comment or on a particular agenda item?**
  PUBLIC COMMENT

- **Please provide your comment for public comment.**
  I am in support of the redevelopment efforts around the parking lot and replacement of the existing structure on the corner of Santa Monica Blvd and West Knoll Drive as part of the 8555 Santa Monica project, however I am concerned with the extension of the project up west Knoll and the replacement of the single family homes correctly present. The proposed structure is large and imposing and frankly too tall for the neighborhood. The structure should not be taller than the Ramada to maintain the openness of Santa Monica Blvd. I am also concerned about how the project negatively impacts the residents at 8562 West Knoll reducing natural light and privacy. The proposed development would increase the traffic on west Knoll which is enjoyed as a quiet place to live by is residents. Please reconsider the enormity of this building and propose a development that compliments the neighborhood rather than completely taking it over.

1

Typeform sent you this email on behalf of a typeform creator. We aren't responsible for its content. If you suspect abuse, like suspicious links, please report it here.

Letter 22

COMMENTER: Justin D.

DATE: November 18, 2021

Response 22.1

The commenter states support for the redevelopment of the site, but also expresses concern regarding the building's size and proximity to single family residences. The commenter states that the proposed buildings' height is not consistent with the existing structures in the community, and that the buildings should not exceed the height of Ramada's existing structures. The commenter also states concerns regarding the project's potential impacts to natural light, traffic, and noise.

With respect to impacts related to building scale, see Response 15.1. See also Response 6.1 for a discussion related to light and shadow impacts and Response 8.1 for a discussion of traffic. As discussed in that response and in Section 4.6, *Transportation,* of the Recirculated Draft EIR, impacts related to transportation were found to be less than significant. As discussed in Section 4.5, *Noise,* of the Recirculated Draft EIR, operational noise impacts were found to be less than significant with mitigation related to HVAC systems and construction noise impacts were found to be significant and unavoidable even with required mitigation. See also responses 9.4 and 28.10. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Letter 23

From: Lynn Russell
To: David Gillig
Cc: Lynn Russell; Adam Koffman; Adam Koffman
Subject: 11/18/21 PC 8555 SANTA MONICA BLVD.
Date: Thursday, November 18, 2021 3:59:23 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Dear Commissioner Hoopengarner and Fellow Commissioners

1 Regarding this project which appears to be significantly comromised in several areas, I fully concur with the findings submitted by AdanmKoffman.

Due to a recent injury it is unlikely that I will be abke to speak at the meeting.

Please extend this message to the interested parties.

Thank you.

Lynn Russell

L. Y. N. N. R. U. S. S. E. L. L
A R T . A N T I Q U E S . D E S I G N
1360 N. Crescent Heights Blvd., Suite 6-C
Los Angeles, Ca. 90046
lenabydesign@mac.com
T 323.850.8689
F 323.650.5307
C 323.447.3319
F

Letter 23

COMMENTER: Lynn Russell

DATE: November 18, 2021

Response 23.1

The commenter states full concurrence with the comments submitted by Adam Koffman.

Please refer to the response to comments for Letters 12, 17, and 27. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Letter 24

From: notifications@typeform.com
To: Bobby Safikhani; David Gillig; John Keho; Jennifer Alkire
Subject: Typeform: New response for Planning Commission Public Comment Form 11-18-21
Date: Thursday, November 18, 2021 4:41:16 PM

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Your typeform Planning Commission Public Comment Form 11-18-21 has a new response:

- **Please provide your name.**
  Mark Hughes

- **Hi Mark Hughes. Please provide your city of residence.**
  West Hollywood

- **Please provide your address and phone number.**
  944 N Orange Grove Ave, 202-903-7640

- **Would you like to comment during public comment or on a particular agenda item?**
  PUBLIC COMMENT

- **Please provide your comment for public comment.**

1 Our planet is burning. That's not hyperbole, it's scientific fact. So it's no good to posture and pretend to care about the environment or to want to prevent catastrophic climate change, if we won't aggressively reduce vehicular driving and parking in favor of mass public transit, bicycling, walking, scooters, and green spaces. Likewise, the continued lack of adequate levels of housing and the obsessive opposition to "tall buildings" among the NIMBY crowd inevitably leads to urban sprawl, necessitating more roads, which leads to more cars and more pollution that accelerate climate change. The WeHo City Council should pursue policies that expand housing, particularly affordable housing, and that reduce roads and parking. Anyone who opposes new housing and who demands more parking and roads is condemning future generations to an unlivable environment. It is selfish and must stop.

Typeform sent you this email on behalf of a typeform creator. We aren't responsible for its content. If you suspect abuse, like suspicious links, please report it here.

Letter 24

COMMENTER: Mark Hughes

DATE: November 18, 2021

Response 24.1

The commenter states concern regarding climate change and states that projects should be designed to utilize transit, bicycling, and walking over vehicular driving. The commenter states that the West Hollywood City Council should pursue policies that expand housing, particularly affordable housing.

The commenter's concerns and opinions are noted. This comment does not pertain to the Recirculated Draft EIR. However, the proposed project would include 111 residential units and 17 affordable housing units and is a mixed-use project located in an area that facilitates walking, biking, and transit use.

Letter 25

-----Original Message-----
From: Michael Lombardi <michael@mlombardi.com>
Sent: Thursday, November 18, 2021 3:56 PM
To: Laurie Yelton <LYelton@weho.org>
Subject: Re: 8555 Santa Monica Blvd. - EIR hearing 11/18

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Laurie,

Thank you for reaching out, I look forward to speaking with you during tonight's meeting as well. Apologies for not emailing this morning. I was hoping to find a window of time to maybe discuss the project together over the phone prior to tonight's meeting, but the day has been consumed with project work and some big deadlines!

I do have some questions. Understanding there is only so much time ahead of the meeting, I appreciate any effort to review and answer these questions, either in email or during our meeting tonight:

Page ES-2:

1 -Under consistency with the zoning ordinance and general plan requirements: "The resulting building site would have split zoning which is allowed in the West Hollywood Municipal Code." Are there any recent precedents for this in the city of West Hollywood? Is there not merit to having the entire site re-zoned for specific use?

Page ES-5:

2 -Alternative 2 is described as "Base Zoning" in the bulleted list, however it is referred to as "Existing Zoning" in the paragraph following. It would be easier to read if this is made consistent throughout all pages of the document. I believe base zoning is used more frequently, including on some of the tables.

-Additionally, should the bullet for alternative 2 read "Base Zoning: (no affordable housing or mixed-use bonuses)

Page 2-12 Concessions:

3 First sentence on the page notes "three associated regulatory concessions" but only two are listed in the bullets below. It appears there are only two concessions based on other portions of the document. Can you confirm?

4

Traffic / Congestion (multiple areas of the document, including ES-3):

-All loading and unloading for all portions of the project via Santa Monica. Does this include residential UPS/FEDEX? Or will drivers simply stay double parked on West Knoll Drive, because they are already there.

5

Grading/Construction (multiple areas of the document including ES-4, 2-17):

-Demo and construction described as about 5 months

-Demo excavation and shoring described as about 6 months on p. 2-16

-5134 round trip truckloads per day not including debris hauling. Do the math based on the proposed construction timeline and this does not seem realistic, or if it is the goal for the project it will be hard not to imagine traffic issues and consistent noise at elevated decibels

6

Page 2-18 / Section 2.8 Required Approvals:

-Approval of (1) sharing paring credits: how are these shared/what portion of the site? Appreciate your help identifying where this is explained in the EIR or exhibits.

7

And a few general questions:

-Are live/work units calculated in the housing element? I believe they are considered commercial, and not counted. Perhaps there is a process for allowing live/work housing to count?

8

-Setback on Santa Monica boulevard is described as 8'-0" at the 4th floor, 27'-0" from the 5th floor. How is this permitted under our code? Is the project assuming exemplary design?

Thank you, I appreciate your review of these questions!

Michael

Michael Lombardi MIES LC LEED AP BD+C

michael@mlombardi.com <mailto:michael@mlombardi.com>

+1.646.709.5440

Letter 25

COMMENTER: Michael Lombardi

DATE: November 18, 2021

Response 25.1

Referencing the Executive Summary of the Recirculated Draft EIR that the project would have split zoning, the commenter asks if there are recent precedents for this in the City. The comment also asks whether there is "merit to having the entire site rezoned for specific use."

At the time that the application was deemed complete, the City Code authorized for development projects that spanned commercial and residential lots, and this project is utilizing this Code section for the proposed project. A rezoning is not required.

Response 25.2

The commenter states that in the Executive Summary Alternative 2 is referred to as "Base Zoning" and as "Existing Zoning" and asks which it should be.

Alternative 2 is the Base Zoning (No Housing and Affordable Housing or Mixed Use Bonus on CC1 lot) alternative. A correction has been made on Page ES-5 in the Executive Summary of the Final EIR to change the reference from "Existing Zoning" to "Base Zoning." This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 25.3

The commenter states that on page 2-12 of the Recirculated Draft EIR a sentence states there will be three regulatory concessions but only two are listed.

The commenter is correct that the applicant is currently requesting two regulatory concessions, but is not forfeiting the third concession. In response to this comment, an edit has been made to Page 2-12 of the Final EIR to clarify that two concessions are being requested, not three. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 25.4

The commenter asks if all unloading and loading, including residential UPS/FedEx, would occur via Santa Monica Boulevard and states a concern about double parking on West Knoll Drive.

As described in Section 2.0, *Project Description,* the loading area, serving all uses on the project site, would be accessed from Santa Monica Boulevard. Trucks would enter the Santa Monica Boulevard driveway and then go straight into the loading area and would not be expected to double park on West Knoll Drive. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 25.5

The commenter states information about the duration of construction activities and states there would be 5,134 roundtrip truckloads per day, which the commenter states is not realistic and would result in traffic issues and noise.

The commenter is incorrect that there would be 5,134 round trip truckloads per day. As described in Section 2.0, *Project Description,* of the Recirculated Draft EIR, assuming approximately 77,000 cubic yards of earth material to be exported and an average truck load of 15 cubic yards, approximately 5,134 round trip truck trips would be needed total. In addition, approximately 376 round-trip hauling trips would be needed to remove the approximately 5,638 cubic yards of demolition debris. These trips would occur over approximately 5 months, or approximately 125 construction days, which equates to approximately 44 trips per day. These trips would also be spread out over the construction day. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 25.6

The commenter asks about the shared parking credits and how are these shared over what portion of the site.

The applicant seeks a reduction in 10 parking spaces for the commercial uses. Detailed parking information set forth below:

Proposed Use	Size	Parking Ratio	Parking Required	Parking Provided
Retail/Commercial	14,488 SF	3.5/1,000	51	50
Restaurant	3,938 SF	9/1,000	35	31
Office	6,711 SF	3.5/1,000	23	18
Personal Service	3,643 SF	5/1,000	18	18
Live/Work	15,494 SF	3.5/1,000	54	54
Commercial Subtotal			181	171 **
Residential	47 x studio/one-bedroom	1 space/unit *	47	47
	34 x two- bedroom	2 spaces/unit *	68	68
	30 x two-bedroom in R4B	2 spaces/unit *	60	60
		Residential Subtotal	175	175
		Total	***356***	***346***

** Per WHMC 19.22.050.F (Affordable Housing Incentives)*
*** Per WHMC 19.28.060.C.3 (Parking Reductions)*

Response 25.7

The commenter asks if live/work units are calculated in the housing element.

Please see Response 12.5.

Response 25.8

The commenter states the setback is described as 8 feet on the 4th floor and 27 feet on the 5th floor and asks how this is permitted under City code. The comment also asks whether the project is seeking exemplary design status.

As explained in Section 4.4, *Land Use and Planning,* in Table 4.4-5, the proposed project would be consistent with applicable setback requirements. Section 19.10.060 of the WHMC sets commercial building façade standards and allows façade articulation which helps provide visual relief and reduce the overall massing of the project. Section 19.06.040 of the WHMC sets setback requirements for multi-story residential buildings. The proposed project would be consistent with WHMC requirements. See also Sheets A4.01 through A4.03 in Appendix B to the Recirculated Draft EIR (Plans, Elevations, Renderings, and Landscaping Plan) which depict height and setbacks of buildings. The proposed project is not assuming exemplary design but has been revised by the Design Review Subcommittee as summarized in Section 1.0, *Introduction,* of the Recirculated Draft EIR.

Letter 26

LOZEAU DRURY LLP
T 510.836.4200
F 510.836.4205
1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
richard@lozeaudrury.com

Via Email

November 29, 2021

Laurie Yelton, Associate Planner
Planning & Development Services Dept.
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
lyelton@weho.org

Re: Comment on Draft Environmental Impact Report, 8555 Santa Monica Boulevard Mixed-Use Project (SCH 2013041041)

Dear Ms. Yelton:

I am writing on behalf of Supporters Alliance For Environmental Responsibility ("SAFER") regarding the Draft Environmental Impact Report ("DEIR") prepared for the 8555 Santa Monica Boulevard Mixed-Use Project (SCH 2013041041), including all actions related or referring to the proposed construction of a five-story mixed-use project with 111 apartment units, 3,983 square feet of restaurant and cafe uses, 15,494 square feet of live/work use, 14,488 square feet of retail space, a 3,643 square foot hair salon, 6,711 square feet of creative office space, and three levels of parking, located at 8555 Santa Monica Boulevard in the City of West Hollywood ("Project").

1 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. SAFER requests that the Planning and Development Services Department 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).

Sincerely,

Richard Drury

Letter 26

COMMENTER: Richard Drury, Lozeau | Drury LLP

DATE: November 29, 2021

Response 26.1

The commenter states he is commenting on behalf of Supporters Alliance for Environmental Responsibility (SAFER) and provides a summary of the proposed project. The commenter suggests that the Recirculated Draft EIR fails to provide adequate information and mitigation measures regarding the project's impacts and requests that the Planning and Development Services Department complete a revised EIR to address this.

The commenter does not provide evidence to support the claim that the Recirculated Draft EIR fails to provide adequate information or mitigation measures. No new significant environmental impacts or increased severity significant impacts warranting recirculation of the Recirculated Draft EIR have been identified. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Letter 27

From: Adam Koffman <arkoffman@hotmail.com>
Sent: Monday, November 29, 2021 2:56 PM
To: Laurie Yelton
Subject: 8555 SMB EIR
Attachments: 8555 SMB - WHNNA Letter May 2013.pdf; 8555 SMB Neighborhood Concerns 5 March 2019.pdf; 8555 SMB - L Yelton Letter Draft EIR 29 Nov 2021.pdf

CAUTION - EXTERNAL SENDER. Please do not click links or open attachments unless you recognize the source of this email and know the content is safe.

Hi Laurie,

1 For the 8555 SMB final EIR preparation, can you please ask the consultants to include & address the issues, concerns and suggestion presented in the three (3) attached documents?

In addition, can the final EIR please study and define how the current project diverges from the city's zoning code, in particular: West Hollywood Code §19.36.170 A "Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts" (see below)?

Sincerely,

Adam Koffman
WHNNA President

19.36.170 Mixed-Use Projects.

A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

1. Minimum Site Area. The proposed parcels shall contain a minimum aggregate area of 50,000 square feet.

2. Zoning District Limitations. Each residential parcel included in the project shall be designated within the R3 or R4 zoning districts.

3. Density. The residential density of the residentially zoned portion of the project shall not exceed that allowed by the applicable residential zoning district.

4. Ground Floor Uses. The portions of the ground floor of a mixed-use project adjacent to a public street frontage shall be used as follows:

a. Commercial Frontage. Residential uses shall not be located within 50 feet of the site street frontage within a commercial zoning district; and

b. Residential Frontage. Only residential uses shall be developed along the site street frontage within a residential zoning district.

5. Existing Alleys. Existing alleys shall be retained within the project unless the review authority determines that the alleys are not needed for loading or circulation.

6. Design Standards. A proposed mixed-use project shall be designed and constructed to:

a. Be compatible with and complement adjacent land uses;

b. Maintain the scale and character of development in the immediate neighborhood;

c. Maintain or increase the existing number of residential units generally and specifically those for seniors and low- and moderate-income households; and

d. Mitigate glare, light, noise, traffic, and other potential environmental impacts to the maximum extent feasible.

e. Be consistent with the goals and objectives of the Climate Action Plan.

7. Loss of Neighborhood Commercial Uses. The project shall not reduce the existing supply of commercial land uses serving the immediate residential neighborhood.

8. Development as separate sites: The residential and commercially zoned portions of the site shall be developed as separate sites, in compliance with the requirements of the applicable district, including density, setbacks, height, and other applicable development standards, except that subterranean parking may be constructed as connected floor plates with no setbacks between district or parcel boundaries.

9. Canopy Trees: One canopy tree for every 6,000 square feet of site area shall be planted at ground level in the ground in a location deemed appropriate to grow a mature canopy tree of the specified species as determined by a licensed arborist.

10. Driveways: The driveways shall be designed and located to minimize impacts to the adjacent residential neighborhood.

29 November 2021

City of West Hollywood – Department of Planning and Development Services
Attn: Laurie Yelton, Associate Planner
8300 Santa Monica Boulevard
West Hollywood, California 90069

VIA EMAIL Lyelton@weho.org

RE: **Recirculated Drat EIR for 8555 Santa Monica Blvd**

Dear Laurie,

In a recent news article,[i] a lawsuit claims construction of a new building in Surfside, Florida caused the tragic collapse of the Champlain Towers in June. The lawsuit contends vibrations from the construction and groundwater funneled from the new building weakened the structure of the Champlain Towers, precipitating its harrowing collapse.

This disclosure should be a red flag to our community and is timely as our city is now evaluating the EIR for 8555 Santa Monica Blvd. Going as far back as 2013, residents have raised serious
2 concerns about our region's **groundwater table** and the **impact major excavation will have on neighboring homes and residents' safety**.

The hydrology report in the current EIR was based on boring tests performed back in 2010 and earlier. Since that time, the groundwater table has risen. We know this because city staff scoped out a $499K road drainage project to mitigate water seepage at the intersection of West Knoll and Westbourne. The staff report for the Council meeting on July 1, 2021 describes the project:

> ...to reconstruct the street with a subsurface drainage system to eliminate the groundwater that has been rising and seeping through cracks in the roadway and pavement. The groundwater is currently reaching the surface of the pavement and washing down the block.

This major road drainage project is approx. 650 feet from the 8555 Santa Monica Blvd site. With such proximity, the groundwater table under the 8555 Santa Monica Blvd site is more than likely in parity. In other words, the 2010 boring tests are likely obsolete and cannot provide reliable data to plan real mitigation needed for the project's deep excavation.

I'm bringing this significant gap to your attention as you coordinate with the consultants on the EIR because hydrology can have a major impact on the structural integrity of adjacent homes and buildings and poses serious risk to residents' safety. This is a fundamental point in the lawsuit filed on behalf of Champlain Towers victims.

In addition to the lack of good, reliable hydrology data in the EIR, there is also a lack of substantial engineering studies on **how the subterranean retaining wall will be constructed and anchored**. Current industry best practice would employ a tie-back method where lateral anchors would be forced under West Knoll Dr to hold back the wall. It's not studied in the EIR how far back the anchors would need to extend beneath the street, or whether that's the intended solution. 2

Like the hydrology study, more engineering studies are needed to evaluate and measure solutions to secure the three-story subterranean retaining wall. This too can pose a risk to neighboring residences. For example, the subterranean garage at the Getty Museum utilized tie-back anchors which extend under the 405 freeway. During construction, damage to the freeway structure was identified due to the torque of the anchors.

Before certification, the EIR needs to lay out the engineering and study the impact of the massive, subterranean retaining wall. And new groundwater table measurements need to be performed in order to formulate mitigation planning more adequate for conditions in 2021, not 2010.

Sincerely,

Adam Koffman
WHNNA President

[i] AP News, "Lawsuit: Florida condo collapse triggered by building wor11/29/2021k", Curt Anderson, 17 November 2021; https://apnews.com/article/lawsuits-florida-surfside-building-collapse-2d589b9d3c6dcb168ba5063eb2ebddf1

Neighborhood Concerns Regarding the 8555 Santa Monica Blvd Project

The developer of the mixed-use project at 8555 Santa Monica Blvd owns the West Knoll properties from Santa Monica Blvd through 8546 West Knoll Dr. This includes three (3) single-family lots. Along Santa Monica Blvd, the developer owns the property from West Knoll Dr to the Wells Fargo Bank. The Santa Monica Blvd lots are zoned for commercial / mixed-use. The three (3) lots along West Knoll Dr are zoned for residential.

The neighborhood has identified seven (7) areas of concern regarding the project.

1. **Tying Commercial & Residential Lots**

   Issue: Consolidating the project into one leads to excess mass, height and density not intended by the Zoning Code, General Plan or State Law. The proposal does not fit the scale of its surroundings nor the capacity of its road infrastructure.

   Because the project falls short of the 60,000 square feet needed to tie the commercial and residential lots, the developer is asking for an exception, or ***waiver***, to the code.[1] This request is one of the concessions and waivers requested by the developer in exchange for providing Affordable Housing. The waiver would blend the two zones allowing the developer to build one big building spanning the entirety.

   As part of the Affordable Housing Development code[2] a waiver gives the developer flexibility to meet the affordable housing requirements when local development standards would ***otherwise make it impossible***.[3] Furthermore, the code requires the developer to make the case for the necessity of such a waiver.[4]

---

[1] The code allows project sites greater than 60,000 square feet and that maintain neighborhood compatibility to ***consolidate*** the project into one (West Hollywood Zoning Code §19.36.170 (A)(1)). The entire property is less than 60,000 square feet, therefore the project is ***not*** eligible to qualify for consolidation. Granting a combined development on a footprint less than the threshold will result in a disproportionate, out-of-scale building.

[2] CA Code §65915 (e)(1) "In no case may a city…apply any development standard that will have the effect of ***physically precluding*** the construction of a development meeting the criteria of…the [affordable housing] densities or…concessions or incentives permitted by this section. An applicant may submit to a city…a proposal for the waiver or reduction of development standards that will have the effect of ***physically precluding the construction of a development*** [from] meeting the criteria of…the densities or…concessions or incentives permitted…." Note that the 60,000 square feet code minimum to consolidate (ibid.) is **not** a development standard but a ***threshold***.

[3] "Waivers are modifications of volumetric requirements that are regulated by the Planning Code. Project sponsors may seek any waivers necessary to ***physically accommodate*** increased density in the bonus program. Requested waivers ***may not exceed that which is necessary to accommodate the bonus***; these would be limited as Concessions and Incentives…." ("Individually Requested State Density Bonus Program Informational Packet", v. 10.04.2017, San Francisco Planning, page 1).

[4] "For waivers and reductions: The applicant must show that ***the development standard*** being waived ***will preclude the physical construction of the project with the density bonus***, incentives and concessions to which the project is entitled" ("A

On the one hand, nowhere does the developer provide justification how the waiver is in fact necessary.[5] In other words, there is no explanation why the project cannot accommodate the affordable housing units and program density bonus if developed separately and according to each zoning district.[6] On the other hand, granting the waiver does not relieve a project from adhering to other critical zoning code, such as the "Mixed-Use Design Standards."[7]

This project ***as one building*** is too tall and massive for the neighborhood, degrading the residential qualities and its intrinsic value, exacerbating the congestion on a major interstate highway, and violating the "Mixed-Use Design Standards" code.[8] The Planning Commission needs to consider the various Alternatives proposed in the Final EIR (Section 6). In particular, the Planning Commission needs to consider aspects of Alternative #2 "Existing Zoning"[9] in addition to the proposed Alternative #6 "Reduced Density on R4B Lots".[10] There is a viable solution by blending the two Alternatives.

There are plenty of examples in West Hollywood where Mixed-Use structures have been able to incorporate the density bonuses and the base affordable housing units all within the commercial parcel. And even the current proposal (Alternative 6 Modified) demonstrates how three (3) affordable units can be accommodated economically on three (3) residential parcels.

Guide to California Density Bonus Law", Hutchins, L. and Tiedmann, K., Oakland, CA, 7 October 2016, page 16). The San Francisco Planning Dept—in an effort to evaluate transparently the state Affordable Housing Density Program—requires applicants of concessions and waivers to submit two project plans: (1) "a fully code compliant base project" and (2) "a bonus project – including details regarding any incentives or waivers requested." (ibid.). Burbank has also taken definitive legislative steps to clarify procedure with respect to granting waivers; viz. Burbank code §10-1-640 (B).

[5] The applicant in his "Narrative" only states: "A waiver of the 60,000 square foot requirement is necessary for the project (Modified Alternative 6) to proceed." ("Soto Capital, Project Narrative"; 26 February 2019, page 7). The Staff Report echoes the same: "Staff ***believes*** that the waiver is appropriate under state law because the project could not be physically constructed without the requested waiver to construct the project on a smaller site. While the state law does not provide conclusive guidance on the application of the waiver provisions, this ***appears*** to be a situation where the state density bonus project as proposed could not be physically constructed on this site, making the waiver appropriate to advance the state's affordable housing goals." ("Planning Commission Public Hearing, Staff Report"; 7 March 2019, page 17).

[6] The Affordable Housing Concession the developer originally sought—prior to the first Planning Commission submission on 1 November 2018—to consolidate the two districts is ***not*** one of the six available concessions listed in West Hollywood Zoning Code §19.22.050 (E)(2) "Affordable Housing Incentives - Concessions". The available concessions are intended to help Developers fit affordable housing into projects. With respect to Concessions, and in distinction from Waivers, "Other [i.e. off-menu] regulatory concessions [may be requested] that result in identifiable, and ***actual cost reductions*** to provide for affordable housing costs or for rents for the affordable units as specified in Government Code Section 65915" (ibid).

[7] "A proposed mixed-use project shall be designed and constructed to…be compatible with and complement adjacent land uses" and "maintain the scale and character of development in the immediate neighborhood"; West Hollywood Zoning Code §19.36.170.A.6 (a-b), "Mixed-Use Design Standards."

[8] Ibid.

[9] Alternative #2 describes two separate developments on the CC1 and R4B lots, consistent with the existing code for the two respective districts (Final EIR Section 6.3, 6-5; page 183).

[10] Alternative #6 describes the structure on the R4B lot without the Density Bonuses nor the Affordable Housing concessions, built strictly to the existing code for that residential district (Final EIR Section 6.7, 6-32; page 210).

Planning Commissioners need to question how the commercial parcel cannot physically accommodate the Affordable Housing Density Bonus and the calculated-base 12 affordable units. In the final analysis, Commissioners will determine a Waiver is not necessary and granting the three (3) Concessions will suffice in order to comply with the Affordable Housing code.[11]

Recommendation: Deny the waiver request to combine the commercial and residential parcels. Continue the hearing and ask Staff to work with the applicant to develop further a residential project on the residential parcels and a mixed-use project on the commercial parcels as envisioned in the City's General Plan and described in the Final EIR Alternative #2.

2. **Preservation of Open Space**

Issue: By consolidating the project into one, the requirement for open space on the residential R4 lots has been muddled. It is unclear if the developer, in proposing Alternative #6, intends to restore the minimum standard for open space.

The neighborhood asks the Planning Commission to find solutions to preserve ***open space***— which otherwise would be required by R4 zoning for the three (3) residential lots. For example, if the three lots were developed like other residential lots in the neighborhood, the code would require setbacks between and in the rear of the lots. There is also specific code requiring minimum setbacks between residential and commercial zones. [12]

By asking for a waiver to tie together the commercial and residential zones, the developer is drastically reducing open space in favor of bigger density ***in a residential neighborhood***. Furthermore, he is excavating the R4 district to accommodate parking generated by the mixed-use CC1 structure.[13]

---

[11] Whether the Planning Commissioners task staff to perform further analysis, state law places the burden of proof on the applicant to justify the need for a waiver: "This subdivision does not prohibit a local government from requiring an applicant to provide reasonable documentation to establish eligibility for…requested…waivers or reductions of development standards…." CA code §65915(a)(2); and, "…the local government shall…provide the applicant with a determination…whether the applicant has provided adequate information for the local government to make a determination as to those…waivers or reductions of development standards." §65915(a)(3)(D)(i)(III).

[12] The proposed project does not comply with the setbacks normally required between commercial and residential zones. West Hollywood Zoning Code §19.20.150 (A)(1) states "All structures shall conform with the setback requirements established for each zoning district." Specific to commercial district CC, Zoning Code §19.10.040 (Table 2-6) states the ***rear setback*** required is: "10 ft. if adjacent to a parcel in a residential zoning district, or more as necessary to provide a minimum separation of 15 ft. between commercial and residential structures; none required otherwise."

[13] West Hollywood Zoning Code Section §19.04.040 (C) states that even when and if the City allows a project to span across commercial and residential zones: "Each portion of the parcel in a separate district shall be developed and used in compliance with the requirements of the applicable district." Note the mezzanine level parking, which opens to West Knoll Dr exclusively, services 105 vehicles. And the lower two (2) levels of parking, servicing 218 vehicles, will extend likewise into the R4 district.

In addition to a hybrid solution—blending aspects of Alternatives #2 and #6—the neighborhood recommends the Planning Commission carefully count how many concessions / waivers are layered into the project. By law, the project is entitled to only three (3) concessions. Yet some Professionals question if "hidden" incentives were worked into the proposal.[14]

Recommendation: Require the project to provide a separate common open area for each of the three (3) parcels in the residential R4 district. This is what other developers of similar residential properties must provide. Not requiring the same of all developers is inequitable and gives this developer privileges not enjoyed by other developers.

3. **Unclear Math for Affordable Housing Density Bonus**

Issue: Controversy continues to surround the method for calculating how the project qualifies for the Affordable Housing Density Bonus.

There is confusion in the community about how the Affordable Units should be calculated. Some Professionals interpret the code to require the allocation be a percent of the total, whereas the developer interprets the language to mean a percent of an ***adjusted*** baseline.

Even more confounding is how the developer modified his baseline unit count for the commercial mixed-use structure (see table below). We cannot find in the Final EIR how the original baseline count of 70 is being adjusted down to 60, ***a reduction of -14.3%***.[15] Needless to say, this change makes it easier to qualify for the Affordable Housing Density Bonus, Concessions and Waivers.[16]

Affordable Housing. Table 4.4-3 summarizes the affordable housing associated with the proposed project. The maximum allowed density bonus is 35%.

Table 4.4-3
Proposed Project Affordable Housing and Density Bonuses

	# Units	% of Baseline (74 units)[1]	Density Bonus Granted
Moderate Income	8	11%	6%[2]
Very Low Income	7	10%	32.5%[3]
Total Inclusionary Housing Units	**15**	**21%**	**35%**

[1] *The baseline number of units is the number of units proposed to be constructed in the zone in which the project is located, prior to the inclusion of the Density Bonus. This is based on either the maximum density in residential areas or the maximum FAR in commercial areas. For this project site, the baseline number of units proposed is ~~70~~ 60 based on the FAR 2.0 (1.5 base FAR + 0.5 mixed use bonus FAR) in the ~~commercial area~~CC1 zone (see Table 4.4-4 below) and 14 baseline units in the R4B zone based on the maximum density of 1 unit for every 872 sf of site area (see also Table 4.4-4), for a total of 74 baseline units.*

[2] *As shown in Table 4.4-1, 5% density bonus for providing 10% moderate income units + 1% bonus for each additional 1% increase in affordable units above 10% = 6%*

[3] *As shown in Table 4.4-1, 20% density bonus for providing 5% very low income units +2.5% bonus for each additional 1% increase in affordable units above 10% = 32.5%. However, the maximum density bonus allowed is 35%. Therefore, the project applicant is seeking a 35% bonus.*

Affordable Housing Table 4.4-3, Final EIR

[14] Note, for example, in Alternative #6 the developer requests a **concession**: i.e., "a 10% rear setback [reduction] on the commercial lots" ("Alternative 6: Reduced Density on R4B Lots," Final EIR, section 6.7, 6-32; page 210).

[15] Table 4.4-3 "Proposed Project Affordable Housing and Density Bonuses", Final EIR, section 4.4-10; page 116.

[16] Attention also needs to be focused on how the 35% Affordable Housing bonus area is being used in the mixed-use structure. West Hollywood Zoning Code §19.22.050 (B)(4) "Affordable Housing Incentives – Limitation on Use of Bonus" states: "A density bonus shall not be…Used to increase any commercial floor area of a mixed-use project; the affordable housing density bonus shall only be applied to the residential floor area of the project."

The neighborhood also questions the designation of 12 units as Live/Work, when their location in the building does not support viable ***commerce***. Specifically, the 12 Live/Work units are located on the ***second*** floor, ***with primary access on the residential side***. In fact, the Live/Work units (along with the "hair salon" and offices) share the same West Knoll ***residential-district*** lobby as all the residential units in the complex.

If the Live/Work units will be used the same as residential units, then why assign them the standalone category? The Planning Commission needs to evaluate if these 12 units warrant this specialized and exempt category. [17]

Given these conflicting interpretations, the neighborhood asks the Planning Commissioners to perform a thorough analysis of the developer's calculations because they form the basis for the generous Affordable Housing density **bonus**, **concessions and waiver**.

Recommendation: Instruct Staff to prepare a table that clearly shows how the mixed-use structure meets the requirements of the Affordable Housing Density Bonus, including a validation of the Live/Work categorization. If the project does qualify, instruct Staff to confirm there are **no code variances** for the ***two respective zones*** other than the three (3) Affordable Housing Concessions.

4. **Natural vs Existing Grade**

Issue: There is discrepancy in the interpretation of the land survey, whether the commercial parcel slopes or lies flat, and its application to code standards. The Planning Commission needs to weigh in on the correct interpretation.

To a passerby on Santa Monica Blvd, it is clear the entire commercial lot is ***level with the sidewalk***, save for the back parking lot on West Knoll Dr. For example, the open area between Wells Fargo and Collar and Leash is level (see photograph). There is no existing slope on the commercial property, only a step-up to the back-corner parking lot.[18] This is corroborated in the geology diagrams included in the EIR.[19]

[17] Regarding its exempt status, Live/Work units do not factor in the baseline units for calculating the Affordable Units requirement. In terms of function, West Hollywood Zoning Code §19.36.160 (D)(1) states for Live/Work units: "The first 50 feet of floor area depth at the ***street-level*** frontage shall be limited to commercial retail sales activities".
[18] The commercial lot is on level grade, with an elevated planter bordering the rear, according to the Topographic Survey map included in the project plans (page7). Up to the elevated planter, along the west perimeter, the slope is approximately 0.7%.
[19] Appendix D "Geotechnical Report", Final EIR, pages 966 and 1,088.

Collar & Leash parking lot, Santa Monica Blvd facing north

The slope line in the submitted plan elevations is extremely misleading. To the naked eye, the majority of the commercial property is level. It does not make sense the developer intends to scale up the height atop a flat surface. We estimate this gives him approximately 1.25 more floor levels than the maximum granted by the multiple bonuses. [20]

The Frontrunners building (8525 Santa Monica Blvd, one block west from the proposed project) encountered the same situation. That developer, however, had to track the building height to the ***existing*** grade—not survey reports from the 1920s.

Deviating from the precedent opens up our City to unintended consequences and lawsuits. The mixed-use roofline, assuming the maximum height, needs to track to the existing grade.

Recommendation: If there is doubt, Planning Commissioners need to visit the site to verify for themselves if the Santa Monica Blvd land slopes up or lies level.

5. **Risk of Extended Stay Conversion**

Issue: The City of West Hollywood was recently sued for $40MM by the 8500 Sunset owner over a possible loophole in the City's Code.[21]

Given the recent events around the Sunset Millenium complex (8500 Sunset Blvd), the Planning Commission needs to ensure the 100+ planned units remain part of our City's long-term housing

[20] West Hollywood Zoning Code §19.20.080 (B)(1) states "The maximum allowable height shall be measured as the vertical distance from the grade ***existing at the time of project submittal*** to an imaginary plane located [at] the allowed number of feet [distance] above and parallel to the ***existing*** grade." The normal allowed height for a mixed-use building in this commercial zone is **55 feet**, with all of the bonuses and concessions being requested. However, the actual height of the proposed building goes up to at least **71 feet** from the sidewalk grade on Santa Monica Blvd, or **29.1% above the maximum limit** (Appendix B, "South Elevation," Final EIR, page 744).

[21] "8500 Sunset Owner Seeks $40 Million in Damages from West Hollywood"; wehoville.com, 12 September 2018.

stock. We are seeing a similar adverse trend in other new mixed-use buildings in West Hollywood, such as the Avalon, Dylan, and Domain, where owners are ***converting apartments into short-term rentals***.[22]

This is tempting to developers / owners because short-term rentals command higher rent than long-term leases. And for rentals over 30 days, these owners do not pay Transient Occupancy Tax to our City. This gives them an unfair advantage over our conventional hotel operators.

We recommend the Planning Commission require a ***condition*** be recorded in the covenant / title documents that only long-term / annual lease rentals are allowed. Otherwise the City may face another lawsuit like the one recently filed by the Sunset Millennium.

Recommendation: Instruct the City Attorney to draft language that will be recorded in the property title documents. The covenant needs to define clearly the planned rental units will function only with annual leases, and monthly leases thereafter, precluding sub-leasing arrangements.

6. **Traffic on West Knoll**

Issue: West Knoll Dr is among the narrowest and oldest streets in West Hollywood. It cannot support the amount of traffic the planned development will demand.

The Planning Commission needs to require a condition requiring a **carriage lane**—on ***both*** sides of the driveway on West Knoll Dr—for passenger pickup and drop off.[23] Because the structures are combined into one, much of the building's vehicle and foot traffic will be shifted to West Knoll Dr.

All the mixed-use units (100+), as well as the second-floor commercial spaces, will enter / exit through the West Knoll lobby. The service elevator, likewise, is adjacent to the West Knoll lobby. And the upper garage fronting West Knoll Dr will service **105 vehicles**.[24] The carriage lane would

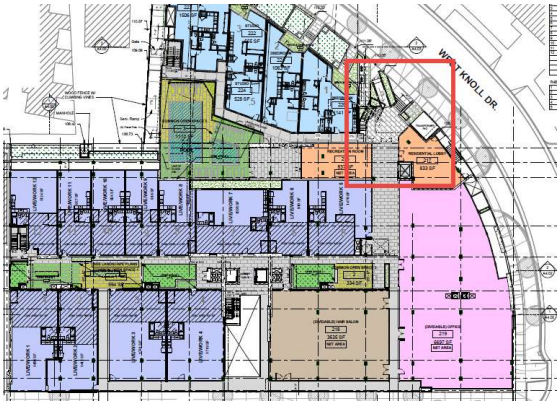
[22] "Letters dated June 12 [2018] from Daniel Mick of the [West Hollywood] city's Code Compliance Division warn the owners of the Dylan, Huxley and Domain apartment buildings on the city's Eastside that they appear to be violating a ban on rentals of less than one year. Such a ban was enacted by the city to prevent building owners from taking apartments off the rental market and to prevent them from unauthorized competition with hotels." *As WeHo Examine AKA West Hollywood, Other Short-Term Apartment Rentals Come to Light*; wehoville.com, 9 July 2018.

[23] The portion of the carriage lane between the driveway and the corner at Santa Monica Blvd would be for loading, unloading and idling so that right-turn traffic onto Santa Monica Blvd would not be impeded. The portion of the carriage lane to the north of the driveway apron would be a yellow loading zone for any moving vans and car service so traffic on West Knoll Dr is not impeded.

[24] Planning Commission meeting 7 March 2019, Exhibit K project plans, "Mezzanine Floor Plan," page 24.

serve to move project traffic off the street and onto project property. This is a standard convention for large multi-unit residential buildings.

West Knoll Dr Residential Lobby, 2nd Floor Exterior



West Knoll Residential Lobby, 2nd Floor Plan

A carriage lane will mitigate problems caused by the tight width of the existing street jamming up with moving vans unloading on West Knoll, Uber cars idling, cars turning in and out of the West Knoll garage, business traffic on the opposite side like Healthy Spot and Total Tan, trash service, delivery trucks, etc., all servicing 100+ units and businesses. We anticipate a serious problem, creating unprecedented roadblock on the residential street. We are offering a reasonable and conventional solution.

Learning from past experience, the solutions provided at Trader Joe's (restricting times for big-rig truck deliveries) and Hancock Lofts (restricting exiting cars from heading north on Hancock) are ***unenforceable***. In hindsight, these solutions did not resolve the issues.

Similarly, construction traffic (such as excavation equipment, cement and lumber trucks, cranes, etc), needs be ***restricted*** in order to minimize its impact on neighborhood parking and traffic flow. It's doubtful the 1920s road infrastructure in the neighborhood can support massive construction loads.

Recommendation: Require the developer to include a **carriage lane** along West Knoll Dr in order to service the high volume of stop-and-go traffic generated by new residents and guests. Ban all construction vehicles from the residential streets and plan to monitor and enforce compliance.

7. **Water Table Level**

Issue: The last water table measurement was taken in 2010. The project has expanded since that date, and it is possible the developer will need to extract large volumes of water. This will likely destabilize the foundations of adjacent buildings.

The neighborhood asks the Planning Commissioners to consider the ***historical*** water table level, not just the one-time reading in August 2010.[25] Summertime is typically the lowest level in the year, and we have been experiencing a long drought.[26] Furthermore, the reading was performed on the commercial lot, but ***not*** the residential lots. It's not clear what the water table level is for those higher-elevation lots.

Boring and Cone Penetrometer Sites, May 2014[27]

This is a critical point, because the developer intends to excavate down three (3) levels, approximately -34 feet below ground, along the West Knoll Dr perimeter. While the Geology

[25] "Prior to the development of the City, West Hollywood was a natural area of high ground water, containing marshland and artesian wells…In some areas of the City, the high groundwater is manifested by water seepage into subterranean garages, street drains, and gutters, and by water in pipeline trenches….Groundwater levels have changed historically based on urbanization and changes in groundwater pumping and use; groundwater levels dropped through most of the 20th century but have recently risen. The California Division of Mines and Geology…encountered groundwater at depths ranging from 10 to 20 feet to deeper than 245 feet in borings from a 1998 study." Final Program Environmental Impact Report City of West Hollywood General Plan and Climate Action Plan Volume 1, City of West Hollywood Community Development Department, October 2010, section 3.7-2, page 226.

[26] "The depth to the water table can change (rise or fall) depending on the time of year...When water-loving plants start to grow again in the spring and precipitation gives way to hot, dry summers, the water table will fall because of evapotranspiration." US Geological Survey FAQ "How can I find the depth to the water table in a specific location?" www.usgs.gov.

[27] Proposed Mixed-use Development Site Plan, Figure 1; GeoDesign Inc., May 2014 (Final EIR, page 1,078).

diagram[28] indicates the historical water level is just below the proposed finished grade, ***the excavation and foundation will go deeper***.[29] The City needs to be conservative in its evaluation.

If water needs to be pumped out during excavation, neighboring foundations will likely be impacted. This is corroborated by a licensed Structural Engineer.[30] Other subterranean projects along Santa Monica Blvd, like Hancock Lofts Apartments (8761 Santa Monica Blvd, three blocks west of the project), caused major water-table complications due to excavation.

The neighborhood asks that a **geological survey** be conducted in order to establish a baseline of existing conditions for surrounding properties. This survey is also in the best interest of the developer, since it can provide evidence in the event of any future damage claims.

Moreover, the City needs to require the developer purchase a **bond for potential damage** caused by settlement of neighboring buildings. Pumping out water will likely destabilize pre-existing foundations. The value of the bond should be determined through a study funded by the development, independently, or allow adjacent properties to set the value.

Recommendation: Require the developer commission a **geological survey** to measure adjacent properties in order to establish a baseline. Require that the developer purchase a **bond** to cover any damages caused by destabilizing foundations of adjacent building.

Conclusion

While the neighborhood is excited about new development and rehabilitating old structures, we are raising serious concerns and making valid recommendations. This proposal is massive and complex, and we appreciate the Planning Staff is doing its best to manage the challenges and complexity of the project.

However, we ask the Planning Commissioners take a hands-on role in analyzing this project in more depth. In particular, we ask that the Commissioners validate if (a) the developer is utilizing only three (3) Affordable Housing Concessions and (b) the Affordable Housing Waiver is necessary.

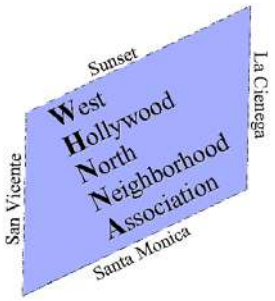
[28] Appendix D "Geotechnical Report", Final EIR, page 1,088.

[29] "The required excavations will extend below the historical high groundwater level, and there is a possibility that ground-water may be encountered during construction at the bottom of the excavation. In this case, suitable groundwater control provisions may be required." Letter to Ben Soroudi from C. Zadoorian, GeoDesign Inc, 22 May 2014 (ibid, page 1,081).

[30] Section 8.0 "Responses to Comments," Final EIR, page 276.

Moreover, we urge the Planning Commission to explore Alternative #2 in conjunction with Alternative #6. **The project needs to be de-coupled and developed as two (2) separate buildings according to their two respective zoning codes, mixed-use vs. residential.**

What the developer is proposing is an extreme amalgamation, where bonuses, concessions, waivers, functions and dotted slope-lines are inter-stitched between the two zones. This has led to a massive structure exceeding the limits allowed even with the maximum bonuses. The assumptions and risks underlying the project need ***clear-sighted*** and ***thorough evaluation*** by the Planning Commission.



May 9, 2013

Laurie Yelton
Associate Planner
Community Development Department
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, California 90069-6216

RE: 8555 Santa Monica Blvd. Environmental Impact Study

Dear Laurie:

The following is an aggregation of the comments and questions from the residents of West Hollywood North Neighborhood Association regarding the 8555 Santa Monica Blvd. Environmental Impact Study.

While the Initial Study indicates that there is no need to study certain categories, we feel that there will be "Potentially Significant Impact" these additional categories:

- Land use/Planning
- Population/Housing
- Utilities

There are also other concerns in categories already deemed Potentially Significant that haven't been judged as so by Rincon Consultants.

I. Aesthetics

a) Scenic Vista (additional question)
One of the unique aspects of West Hollywood is the vista of the Hollywood Hills rising up above our boulevards. How would the construction of a 5 story building not block this vista? Would a reduction to 3 stories be an alternative that would mitigate this?

c) Visual Character of site and surrounding
This building will be the tallest building on Santa Monica Blvd. with the exception of the historical Emser building. This lack of compatibility and scale with both the residential structures behind and even with the commercial structures on SMB can only be mitigated by a reduction in both size and footprint (please address the requested variances in required setbacks). This is a massive project that significantly alters the character of the neighborhood.

This project has virtually no articulation on 3 sides of the project.

The east side of the building is a solid wall right next to the sidewalk. This is not congruent with the "pedestrian friendly" goals in the General Plan. How can this be mitigated? Can the South East corner of the building be cut at an angle (like the Face Place) and storefront windows installed on the east side?

The west wall is a large concrete surface with very little articulation. The view of this building for every driver and pedestrian eastbound will be far from aesthetically pleasing. The guests of the Ramada will be looking at a large wall. How can this be mitigated? What additional articulation can be incorporated?

Current plans seem to include very large blocks of the building to be devoted to signage? Does this comply with current code for SMB? What will be the impacts of the lighting of such large signs?

While we laud the inclusion of a green roof, what will be the impacts visually and from runoff of a failure to maintain the roof? Will the roof be accessible by residents and if so, how will that impact the ability to maintain the plantings?

d) Shade
Who will pay for landscape that doesn't survive shadowing from the building? What possible materials can be used in green space without available sunlight?

II. Agricultural Resources

No questions

III. Air Quality

b) Air quality standards
This project will more than double the population of a single city block adding hundreds of vehicle trips per day and significantly impacting the air quality. The Initial Study states that the city's current population is 34,822 and that the addition of 141 people would be within the 35,100 projected for 2020 and that "**Impacts would less than significant further analysis of this issue in an EIR is not warranted."** This statement does NOT account for the impacts of all of the projects currently entitled or under construction—significantly Sunset Millennium and Movie Town, which will be hundreds of new residents.

What are the environmental impacts of all of these projects as a whole, not just peeled off and counted one at a time?

What will be the projected emissions and how would this project propose to mitigate them?

During construction, how many loads of soil will be removed?
How many vehicle trips will be involved?
Will trucks be allowed to idle at the construction site?
Will trucks be diesel, gas or low emission?

IV. Biological Resources

No questions

V. Cultural Resources

No questions

VI. Geology and Soils

a) i) Rupture of known earthquake fault
What provisions have been made to mitigate any damage due to an earthquake during construction?

a) iv) Landslides
Tons of soil will be removed and a three-story hole will be formed at the north edge of the project. Why are there no concerns of a landslide?

d) Expansive Soil
"…expansive soils exist in the City but are more prevalent in the southern part of the City." Whether or not expansive soils are "more" prevalent south of SMB, they are significant north of the Blvd. Any number of property owners in the neighborhood can testify to this. We believe there is a significant amount of expansive soil under this project and would like to understand the effect of the project. What does ACTUAL soil testing show to be the facts?

Subsidence
While the Initial Study states that this parking lot will only go down one story, this is only true for the SMB side of the project. The north side of the project will remove at least 3.5 stories of soil from the hillside to build the parking lot. What are the historical impacts of subsidence in this neighborhood? What are the likely impacts of a construction project of this magnitude?

Soil Conditions
Developer has asserted that they will use a "new" technology called Mat Slab to address the water issues. However, it is our understanding that specific soil and geology requirements must exist for this technology to be successful. Does the geology and soils meet these conditions? If not, what are the conditions and what mitigants would be required?

VII. Greenhouse Gas Emissions

How will the significant amount of CO2 emissions from 4 levels of parking be handled?
How will it be vented?
How will neighboring residences be protected?

VIII. Hazards and Hazardous Materials

No questions

IX. Hydrology and Water Quality

a-e) Goundwater, Drainage and Runoff (additional questions)
We know that this site overlays a major underground water system that had sufficient reliable flow to supply the Beverly Hills Water Department water wells on La Cienega for close to a century. Please describe this system including source watershed, source flows, routes and dimensions of major aquifers and rivers, flow rates, directional flows, and pressures, and the impacts of its interference.

Please study surface runoff and the impacts of the project on surface runoff. The existing structures contain many varieties of surfaces that hold, diffuse and redirect runoff. The proposed project is more monolithic and would appear to have more impervious surfaces.

We believe there needs to be a complete evaluation of surface water flows, particularly impacts upon gutters and storm channels. Will the project have any impact upon areas downstream? Will increase surface run-off exacerbate surface flows?

Due to the topography and grade, area gutters and storm drains are known to overflow during heavy rains and rainy seasons. Is there capacity for extra runoff? How much capacity is there and how much will this project contribute? How much will the project pay to offset this contribution?

Local experience with the high groundwater table is extensive and spans periods of drought and deluge. There have been numerous reports of special problems in the area owing to the high groundwater table including subsidence, collapse, flooding, flotation, buoyancy, mold, and the discovery and inadvertent dispersal of hazardous and/or toxic substances including but not limited to oil, tar, explosive fumes, gasoline and oil production residue.

These conditions and environmental impacts need to be adequately assessed, described, quantified, evaluated and subsequent mitigation measures discussed in the DEIR.

We know high water table conditions have interfered with construction on Hancock and West Knoll causing catastrophic structural collapse around the project site within the same watershed.

Similarly many of the residential and commercial buildings in this area require extensive use of sump pumps to attempt to mitigate the effects of the voluminous underground water and high water table and several local buildings have been materially affected by this issue long term. There is substantial concern that the subterranean parking systems, no matter how well shielded, may divert substantial underground water flow onto adjacent properties, with the potential for serious long term damage and injury to those properties.

How will sump pump and other mitigation systems in nearby buildings be impacted?

Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

Please provide data or modeling to assess similar impacts related to interference with this major underground water system. What happens should the proposed project act like a dam or a huge impenetrable obstacle across this major water system? Will the neighborhood to the north saturate and flood? How much can we expect the groundwater to rise? How will sump pump and other mitigation systems in nearby buildings be impacted? Will this project require nearby buildings to modify or materially increase their underground water mitigation measures?

What will be the impact on the trees and plantings in the neighborhood to the south where many mature trees draw from the existing water table? What is the projected new route of this water system when it is interrupted with this project? What impact will there be to surrounding properties, streets and major public and private assets? What protection is needed to warrant surety, completion, and indemnification for potential damages? And how much variability is caused by actual accumulated seasonal rainfall?

What are the long-term effects of the underground conditions on liquefaction and on the water table?

What is the proposed disposal for the discharged groundwater during construction?

What are the potential impacts on structures to the south of the Blvd. with the loss of ground water? What are the potentials for sinkholes, settling or other structural impacts?

What is the projected daily volume in gallons of water that will be pumped from this project? What is the current volume pumped from 901 Hancock?

How will this ground water dumping impact the storm drain system?

X. Land Use and Planning

b) Land Use Plan (additional question)
The current zoning for this location is CC1 for 35 feet. Bonuses have been given to bring the building to a maximum of 55 feet.

Code 19.36.170 Mixed-Use Projects
A. *Mixed-Use Projects that Span Both Residential and Commercial Zoning Districts.* A proposal to consolidate abutting residential and commercial parcels into a unified mixed-use project shall comply with the following standards.

- **Minimum Site Area**. The proposed parcels shall contain a minimum aggregate area of **60,000 square feet**.
- Design Standards. A proposed mixed-use project shall be designed and constructed to:
  - Be compatible with and complement adjacent land uses;
  - Maintain the scale and character of development in the immediate neighborhood;

The project doesn't meet either of these Zoning Code criteria. It is only 45,000 sq. ft. in size and its scale is massive, clearly incompatible with nearby land uses and overpowers the neighborhood.

It is also unclear from the project documents whether a rezoning of the residential parcel is being requested or if a zone text amendment attempting to revise the provisions of Zoning Code Section 19.36.170 is being requested to provide new and different standards for mixed use projects spanning across residential and commercial zones.

"The proposed project is also in the General Plan Mixed-Use Incentive Overlay Zone and in a Transit Overlay District. The Mixed-Use Inventive Zone allows for new development with a mix of residential and commercial uses to receive an additional 0.5 FAR and ten feet in height. The Transit Overlay District identifies sites close to major transit nodes for which modifications to the General Plan's permitted density, height, parking requirements, or other development standards may be considered when projects provide Transportation Demand Management programs."

What "major transit nodes"? Other than a bus line what "major transit" is mitigating this additional density?

Under what law, ordinance or other agency is the 10% reduction in setbacks qualified or allowed? What are the impacts on the neighborhood of these reduced setbacks?

XI. Mineral Resources

No questions

XII. Noise

b) Excessive groundbourne noise and vibration (additional question)
What are the plans to mitigate the excessive noise and vibration during construction? The noise and vibration during construction will have a very serious negative economic impact on the Ramada Hotel and all the commercial businesses in the area. Hotel rooms and facilities near the construction area will become very undesirable during construction and definitively decrease room and other revenues as well as the resulting transit occupancy tax revenues to the City.

Nearby residents will similarly suffer similar serious extended negative impacts to the quiet enjoyment of their homes. Many of the residents of this neighborhood work from their homes—this will become untenable during an extended construction period.

Given the seriousness of the noise and vibration impacts over an extended construction period special well tailored additional mitigation measures and conditions should be imposed to hopefully limit and minimize the deleterious effects.

What will be the noise/vibration from delivery trucks?

Will all delivery trucks be required to use the garage entrance or will they be allowed to park on the street. Note: Moving vans and other delivery vehicles use the street at 901 Hancock, significantly impacting neighborhood with sound, vibration, blocked parking and other access issues.

What is the noise impact of 93 condensers on the roof to surrounding homes? Where will the condensers be located given the green roof design?

What will be the noise impacts of the outdoor patio on the west side of the building on the guests of the Ramada?

f) Excessive noise from active airstrip affecting residents of project
West Hollywood Sheriff and Cedars Sinai helicopter pads are active airstrips in the vicinity.

XIII. Population and Housing

a) Substantial population growth (additional question)
Nearly 10 new apartment/condo and/or mixed use buildings, many of them quite large in scope are either already under construction, entitled or otherwise planned by 2020 and there is concern that the cumulative impacts of all these new residential and mixed use projects will drive the City's population well over

the planned 35,100 that the city is estimating by then. What are the exact beds/baths and populations counts planned for all these projects COMBINED?

To our knowledge the list of projects Under Review, Approved or in Construction is well over 2,000 units which would put the population growth at close to 4,000 people which more than a 10% increase in our current population.

Under Construction	
Monarch I &II	**371**
Courtyard @ La Brea	**32**
1232 Kings Road	**25**
Total Under Construction	**428**
Approved	
Sunset Milennium	**190**
Movietown	**371**
Palm Restaurant	**42**
House of Blues	**40**
Total Approved	**643**
Under Review	
Melrose Triangle	**191**
Faith Plating	**166**
8555 Santa Monica	**102**
8899 Beverly (office building conversion)	**82**
Total Under Review	**541**
Projects with Less Than 20 Units	**414**
Total Units	**2,026**
Not Included	
Edition Hotel/Condo	
9001 SMB	

This project will literally double the number of residential units in the immediate neighborhood. Will the sudden increase negatively impact the quality of life there and if so how can those impacts be mitigated?

XIV. Public Services

a,b) Fire and Police Protection (additional question)
Doubling the population of the neighborhood puts strain on both sheriff and fire departments and services. The small street of West Knoll will also hamper

access to the building during emergencies. What are the impacts to safety of the neighborhood and the City as a whole of congestion at La Cienega & SMB and other streets?

XV.Recreation

No questions

XVI. Transportation/Traffic

a-f) Traffic study

We'd like an in-depth analysis of major streets and all intersections within a half-mile of the project, with such a study based on recent, realistic traffic counts (i.e, not collected during the summer, or on holidays, or on a Sunday). These streets should include Santa Monica, West Knoll, Westbourne, Westmount, Holloway, Fountain, Sunset, Hancock and Rugby.

The study should specifically address the impacts on the West Knoll cul de sac and explore options to help mitigate those impacts.

Cars eastbound on SMB will have three choices to enter this project:

1. Wait at the long light on Westbourne, turn left, cut up Westbourne, right on West Knoll and then either into the residential lot or right again on SMB.
2. Make the U turn at the cut in front of Ramada, turn right on Westbourne and then same as 1 above.
3. Go to La Cienega, wait for a long light, make a U turn.

This will put a tremendous strain on Westbourne and West Knoll both in terms of traffic and safety.

What are the trips pre- and post-construction on each of these streets and intersections?

Left turn at Westbourne
U-turn at West Knoll and Santa Monica
U-turn at La Cienega
Left turn from La Cienega to Santa Monica

Similarly given the size of this project and the substantial increases in both residential and commercially generated traffic, the impacts on the nearest signaled intersections at Westbourne and Santa Monica, the intersection at Westmount and Holloway (which serves as a major point of ingress and egress for residents in West Hollywood North) the Westmount/West Knoll round about, and the West Knoll/Santa Monica Boulevard intersection should all be studied, impacts analyzed and mitigation measures considered.

In the previous studies, sometimes they used V/C figures and sometimes they used Delay. This was very confusing and we can only assume they used the number that was the more optimistic/favorable of the two. Please publish both sets of numbers.

In the previous studies, gross averages were used versus peak-hour level of service. Gross averages do not reveal the peak-hour level of service. Gross averages can actually mask peak impacts. We would specifically request that peak-hour data be provided. We would like to see charts by peak-hour level of service for am and pm. This is especially true of Holloway, Fountain, and the La Cienega/SMB intersection in all directions.

What is the plan for ingress/egress of retail, retail deliveries and residents?

The most recent plan shows additional medians in West Knoll, presumably to prevent left turns out of the project. Has this design ever been used on another project? If so, have post construction studies been done to establish the level of success? Given the narrowness of the street, is this feasible? Would it require removing all street parking in the lower section of West Knoll?

Given the existing F level of traffic on Santa Monica Boulevard during extended periods of the day, ingress/egress must be carefully studied, impacts analyzed and hopefully some mitigation measures developed. How will vehicles exit the project when traffic is solidly backed up Westbound on Santa Monica Boulevard?

Will there be a resulting substantial increase in traffic at the next major signaled intersection making a right (North) or left (south) on Westbourne Drive to avoid traffic ahead? i.e. cars trying to cut through the neighborhood to avoid SMB.

Given the F level of traffic on Santa Monica Boulevard, many local residents access their homes from Holloway to the north. It must be anticipated that both new residents and commercial patrons of this project will do the same thing. How, if at all, can this increased traffic flow on the residential streets be mitigated? Will the roundabout at West Knoll/Westbourne still accommodate and work with the increase in traffic?

Will there be significant impacts at the major LaCienega/Santa Monica Boulevard intersection, especially during rush hours, especially to Westbound lanes of traffic and traffic travelling south on LaCienega making a right turn onto Santa Monica Boulevard? If so, what are the additional traffic mitigation measures?

Will residents be given parking passes for guests?

Will parking places on West Knoll be eliminated?

What is planned for vehicles exiting West Knoll?

How will left turns from the exit onto West Knoll be mitigated?

Historically the City has required new developments to widen the street for new developments. Why has that requirement been waived for this project? What will be the impacts of the failure to do so?

Will commercial vehicles be accessing the project from West Knoll? Where are all of the loading and unloading zones and what conditions will be imposed to eliminate impacts of delivery trucks on West Knoll Drive? Given the narrow size of West Knoll large delivery trucks will be unable to properly access the project from West Knoll and/or they will significantly impede residential traffic in the area and potentially block and/or substantial impede access to residents parking in their nearby residential buildings.

The sharp angle of the West Knoll entrance will make it very difficult for delivery trucks to enter the building from Santa Monica Blvd.
Will trucks be permitted to drive through the neighborhood for easier access?
How will the impact of this traffic, noise, etc. mitigated?
Should all commercial vehicles be banned on West Knoll Drive?

Parking
Guest parking for 8535 West Knoll is an open , unsecured lot. Given the paucity of guest parking at 8555 SMB and the current restriction against permit parking, this lot will be a target for visitors at 8555 SMB. There will be costs for 8535 to monitor this. How can these costs and disturbances be mitigated?

Will businesses in this project be allowed to apply for C parking permits for their staff to park on neighborhood streets?

What will be the onsite parking demands of the proposed commercial and retail uses of the property? i.e. the "normal" parking demands for a 6,000 sq. ft. restaurant. What would be the peak demand for a "hot" restaurant?

Staging
During construction, how and where will construction vehicles be staged?
During concrete pours, will all street parking on West Knoll be blocked?
How many truck trips will be required?
How many trucks will be allowed to line up at one time?
Will they be allowed to idle indefinitely?
Where will construction workers park?
Will staging be limited to SMB? If so, how will that impact the intersection at La Cienega?

XVII. Utilities and Service Systems

a) Wastewater

Will the evacuated ground water be put through the sewer system? If so, what will be the volume and does this meet Regional Water Quality Control Board requirements?

f) Solid Waste (additional question)
Major landfills are closing in the next year. What will the additional waste requirements of this project do to City's requirements for waste disposal and how will this service be provided?

Electricity
The electrical infrastructure of this neighborhood is severely antiquated in inadequate to current demand. In the past three years there have been at least three transformer explosions within two blocks of this project that put residents at risk for their safety and causing days long power outages. What will be the additional electrical demands for this project? How will they be provided? How will the risks of future transformer explosions be mitigated?

XVIII. Mandatory Findings of Significance

Multiple Project Impacts
We request a special section that specifically evaluates comprehensive environmental impacts from concurrent projects (i.e., Gold's Gym, Ramada improvements, Millenium project, etc) located within close proximity to one another and surrounding the same critical intersections.

XIX. Additional Items

Alternatives for this project

Reduce size to three stories.
Remove traffic entrance from West Knoll.
Remove balconies facing north.

3 Story mixed use with ground floor retail and second & third stories townhome style two story live/work spaces. Narrow and tall with balconies on the SOUTH side of the building.

Sincerely,

Lynn M. Hoopingarner
Vice President
West Hollywood North Neighborhood Association

Cc: Council Member D'Amico
Council Member Duran
Council Member Heilman
Council Member Land
Council Member Prang

Delivered via email:
lyelton@weho.org
jdamico@weho.org
jduran@weho.org
fsolomon@weho.org
aland@weho.org
jprang@weho.org

Letter 27

COMMENTER: Adam Koffman, President, West Hollywood North Neighborhood Association

DATE: November 29, 2021

Response 27.1

The commenter includes three attachments and requests that the issues raised in the attachments to be addressed. The commenter also requests the EIR study and define how the project diverges from the zoning code with respect to WHMC Section 19.36.170A, Mixed Use Projects that Span both Residential and Commercial Districts.

With respect to WHMC Section 19.36.170A, please see response 12.2. The three attachments include: 1) a letter dated November 29, 2021, 1) a letter summarizing neighborhood concerns dated March 5, 2019, and 3) a letter dated May 9, 2013.

The comments in Attachment 1 are addressed in responses 17.1-17.4. The comments in Attachment 2 are addressed in responses 12.3-12.11. Attachment 3 is a letter submitted during the Notice of Preparation (NOP) comment period. Comments submitted during the NOP are summarized in Section 1.0, *Introduction,* Table 1-1 of the Recirculated Draft EIR and addressed throughout the Recirculated Draft EIR.

Channel Law Group, LLP

Letter 28

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

November 29, 2021

VIA ELECTRONIC MAIL

City of West Hollywood
Department of Planning & Development Services
8300 Santa Monica Boulevard
West Hollywood, California 90069
Attn: Laurie Yelton, Associate Planner
Email: Lyelton@weho.org

RE: The Recirculated Draft Environmental Impact Report for the 8555 Santa Monica Boulevard Mixed-Use Project, State Clearinghouse Number: 2013041041

Dear Ms. Yelton:

This firm represents The North West Knoll Drive Association ("Association") with regard to the project currently proposed at 8555 Santa Monica Boulevard ("proposed Project"). Association hereby adopts all project objections, comments, and all evidence/studies submitted in support thereof, and specifically requests that the City print out or attach each and every hyperlinked document cited in all comment letters in the administrative record for this Project. 1

Please add this law firm the list of interested persons to receive all notices related to this Project.

As explained in the Notice of Availability ("NOA") for the Recirculated Draft Environmental Impact Report ("RDEIR") for the Project.

Project History:

A Notice of Preparation (NOP) of a Draft EIR was issued for public review and comment on April 12, 2013 and a scoping meeting was held on April 22, 2013. **After the NOP period, the project was revised to add residential lots to the project site** (along West Knoll Drive) and incorporate modifications based on 2

neighborhood input. A second scoping meeting was held on August 22, 2016. A Draft EIR was circulated for a 45-day public review period that began on June 29, 2017 and concluded on August 21, 2017. After the public comment period, **the project site was further expanded to include an additional residential lot and other modifications.** The City of West Hollywood has prepared the Recirculated Draft EIR to analyze environmental impacts of the proposed project **based on changes made to the project** and regulatory changes after its original circulation in 2017.[1] **(Emphasis added).**

Since 2013, the proposed development project at 8555 Santa Monica Boulevard has continued to evolve and with it the environmental documents issued by the City of West Hollywood ("City"). As is evident from the administrative record, the City has failed to proceed in the manner prescribed by the California Environmental Quality Act ("CEQA") and CEQA Guidelines. Rather than treat each new development proposed for the expanding site, as a new project, each subject to their own environmental review, despite the eight-year passage of time, the City has proceeded with one long CEQA process, and issued an RDEIR for the newest project iteration, despite the fact that it is substantially different than earlier iterations of development proposals for the site, and includes additional land area.

2 cont.

The environmental process for the proposed development at 8555 Santa Monica Boulevard is therefore not consistent with CEQA process requirements, and is a clear example of an evolving EIR with a lack of an accurate, stable and finite project description. The City must therefore stop what it is doing, deny the prior version of the project, start the CEQA process for the current development proposal ("proposed Project"), issue the required Notice of Preparation (NOP) and complete the NOP process before issuing a Draft EIR ("DEIR") for the proposed Project.

The Evolving Project and It's CEQA Process History

The City began the environmental process for a development at 8555 on April 12, 2013 with the issuance of a Notice of Preparation, but did not issue the Draft EIR ("DEIR") until July of 2017. Key steps to-date in the eight year and seven-month long CEQA process include:

3

- **Issuance of an Initial Study and the NOP on April 12, 2013**[2] - The NOP for the original development proposal at 8555 Santa Monica Boulevard described the development as:

  Project Location: The 1.04-acre project site is located at 8555 Santa Monica Boulevard on the north side of Santa Monica

[1] https://files.ceqanet.opr.ca.gov/222077-3/attachment/pT1twLqBy5pioVFaip3q44o-a3IuszMVeg2SqS5FxSMbLisnKVsduyPzHN_cUukOqeS-XA927fEKWEWs0

[2] The original Initial Study and NOP are available at: https://www.weho.org/city-government/download-documents/-folder-917

3, cont.

Boulevard at West Knoll Drive in the City of West Hollywood, western Los Angeles County. The site is currently occupied by three two-story commercial buildings, one single-family residence located at 8532 West Knoll Drive, and two surface parking lots.

Project Description: The proposed project involves construction of a mixed-use development. The mixed-use development would be five stories in height and would include: 93 apartment units (19 of which would be designated as affordable housing), approximately 6,720 square feet (sf) of restaurant and cafe uses, approximately 4,708 sf of live/work use, and approximately 27,840 sf of retail uses. Commercial and live/work uses would be on the first two floors and residential units would be on levels 3, 4, and 5. The project also includes four levels of parking with 308 vehicle parking spaces as well as 45 bicycle parking spaces. One level of the parking structure would be subterranean. Primary commercial access to the project site would be located along Santa Monica Boulevard and primary residential access would be located along West Knoll Drive.

Project implementation would require demolition of three existing two-story commercial structures, an existing one-story single-family residence, and surface parking areas on the project site.[3]

- **Release of the Draft EIR[4] ("DEIR") dated July 2017** – This DEIR included as Appendix A an Initial Study dated July 2017, but signed on April 11, 2013.[5]

  By the time the DEIR was released the project site area had expanded from three to five parcels (APNs 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339-005-025) and the development had undergone some modifications. According to page ES-1 to ES-2 of the DEIR:

  > The project site encompasses 55,138 square feet (sf) (approximately 1.27 acres) and includes five parcels (APNs: 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339-005-025). . .
  >
  > The proposed project would be 55 feet in height and would include 97 apartment units (15 of which would be designated as affordable housing), 2,820 sf of restaurant and cafe uses, 16,673 sf of live/work use (12 units), 15,678 sf of retail space, a 3,718 sf hair salon, and 6,079 sf of creative office space. Commercial uses would be on the first floor and partially on the second floor. Residential units would be on levels 2, 3, 4, and 5.

[3] https://www.weho.org/home/showpublisheddocument/12741/635465522194370000
[4] The DEIR is available at: https://www.weho.org/city-government/download-documents/-folder-130
[5] See DEIR Appendix A, page 5, available at: https://www.weho.org/home/showpublisheddocument/32950/636349478245270000

3, cont.

Apartment units would range in size between 461 and 1,863 square feet (not including patios and balconies).

The project also includes three levels of parking with 337 vehicle parking spaces (which includes 1 additional space beyond City requirements) and 35 bicycle parking spaces. One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.

According to DEIR Table 2-1, the DEIR version of the development would have a total floor area of 143,736 square feet. It would include:

Commercial
Restaurant/Café: 2,820 sf
Live/work space: 16,673 sf
Retail: 15,678 sf
Office: 6,079 sf
Hair Salon: 3,718 sf
Subtotal: 44,968 sf

Residential
Apartments: 90,819 sf
Residential Lobby: 639 sf
Residential Recreation Room: 610 sf
Residential Storage: 2,876 sf *Subtotal: 94,944 sf*
Circulation (stairs, elevators, corridors, trash chute); waste/recycling; electrical; shower/locker: 3,823 sf

Total Floor Area: 143,735 sf

The housing units included:

1-bedroom: 40
2-bedroom: 57
Total Apartment Units: 97 units
Live Work/Units: 12 units

By the time the DEIR was issued, the number of affordable units had been reduced to 15 from the 19 in the NOP:

Very Low Income Units: 7
Moderate Income Units: 8
Total Affordable Housing: 15 units (out of the 97 total units)

- **<u>Release of an FEIR[6] dated May of 2018</u>** - It is unknown what action, if any, was taken on the FEIR.

- **<u>An Initial Study[7] dated September 9, 2019</u>** – This Initial Study was prepared by Dudek. Although it appears on the environmental document page of the City's website, it is unclear if it was ever released to the public as part of the CEQA process.

- **<u>Release of the Recirculated Draft EIR[8] dated October 2021</u>** – The Notice of Availability (NOA)[9] for the RDEIR was issued on October 14, 2021 and the public comment period ends on Monday November 29, 2021 right after Thanksgiving weekend. Despite the fact that there are two holidays (Veterans Day and Thanksgiving) during the public comment period, the City has rejected our clients request to extend the public comment period.

  The RDEIR includes as Attachment A, a different Initial Study dated October 2021 prepared by Rincon.[10] Page 5 of the October 2021 Initial Study states:

> A Notice of Preparation (NOP) of an environmental impact report, along with this Initial Study, was distributed for a 30-day agency and public review period on April 12, 2013. **The applicant revised the project** and a Draft EIR and revised Initial Study was circulated for a 45-day public review period that began on June 29, 2017 and concluded on August 21, 2017. Since then, **the applicant has again revised the project** to add an additional residential lot along West Knoll Drive to the project site **and revised the proposed project**, also incorporating modifications to address some of the neighborhood issues raised. This Initial Study has been updated to reflect these revisions and will be recirculated with the revised Draft EIR. **(Emphasis added)**

3, cont.

There is no evidence of the issuance of any NOP, other than the April 12, 2013 NOP in the Office of Planning and Resource (CEQAnet) files.[11] Despite the fact that it was more than eight years since the issuance of the NOP and the development had been revised multiple times, no NOP was issued for the preparation of the Recirculated DEIR. Similarly, the Initial Study for the revised project was not circulated for public review and

[6] https://www.dropbox.com/s/6jvyj38524r26kl/8555%20Santa%20Monica%20Blvd%20Project%20Final%20EIR%20%28Master%29.pdf?dl=0

[7] A 9/9/2019 Initial Study prepared by Dudek is available at: https://www.weho.org/home/showpublisheddocument/41601/637051995448470000

[8] The RDEIR is available at: https://www.weho.org/city-government/download-documents/-folder-1417#!/ The OPR record for the RDEIR is available at: https://ceqanet.opr.ca.gov/2013041041/3

[9] The NOA is available at: https://files.ceqanet.opr.ca.gov/222077-3/attachment/pT1twLqBy5pioVFaip3q44o-a3IuszMVeg2SqS5FxSMbLisnKVsduyPzHN_cUukOqeS-XA927fEKWEWs0

[10] https://www.weho.org/home/showpublisheddocument/51248/637703411226070000

[11] See OPR records for State Clearinghouse (SCH) Number 2013041041 available at: https://ceqanet.opr.ca.gov/Project/2013041041

comment. Instead, the City relied on the NOP for a different development proposal for a three parcel version of a development proposal at 8555 Santa Monica Boulevard issued in April of 2013.

The current version of the proposed Project is described in the NOA for the RDEIR as follows:

3, cont.

> The project site is located at 8555 Santa Monica Boulevard in the City of West Hollywood. The project site encompasses 61,097 square feet (sf) (approximately 1.4 acres) and includes six (6) parcels (APNs: 4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339- 005-025). . .
>
> **Project Description**:
> The proposed project would involve the demolition of the three existing two-story commercial structures (approximately 27,338 square feet) as well as four existing one-story single-family residences and surface parking areas, and the construction of a mixed-use development on the same site. The proposed project would be 55 feet in height and would include 111 apartment units (17 of which would be designated as affordable housing), 3,983 square feet of restaurant and cafe uses, 15,494 square feet of live/work use (12 units), 14,488 square feet of retail space, a 3,643 square foot hair salon, and 6,711 square feet of creative office space. The project also includes three levels of parking with 346 vehicle parking spaces (which is 10 spaces less than the required number of spaces for the project) and 133 bicycle parking spaces. One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.

Table 1 summarizes some of the key difference between the NOP version of the project (i.e. the 2013 version) and the currently proposed Project:

TABLE 1
EVOLVING PROJECT

	2013	**2021**
Lot Size	1.04 acres. Includes three (3) parcels: APNs: 4339-005-012 4339-005-013 4339-005-025	Approximately 1.4 acres; 61,097 square feet (sf) Includes six (6) parcels: APNs: 4339-005-009, 4339-005-010, 4339-005-011, 4339-005-012, 4339-005-013, and 4339- 005-025

3, cont.

TABLE 1 EVOLVING PROJECT		
	2013	**2021**
Square Footage	Unknown, DEIR version with two additional parcels included 143,735 sf of Floor Area	158,836 sf of Floor Area
Existing Uses to Be Demolished	Three two-story commercial buildings, **one single-family residence** located at 8532 West Knoll Drive, and two surface parking lots	Three existing two-story commercial structures (approximately 27,338 square feet) as well as **four existing one-story single-family residences** and surface parking areas
Height	55 feet in height	55 feet in height
Number of Stories	5 stories	5 stories above ground
Density	93 units per acre FAR = 2.7	FAR 2.8 (CC1 portion only)
Number Residential Units	93 apartment units (19 of which would be designated as affordable housing): 1-bedroom: 51 2-bedroom: 41 3-bedroom: 1	111 apartment units (17 of which would be designated as affordable housing): Studio: 6 1-bedroom: 41 2-bedroom: 64 *Very Low Income Units: 6* *Low Income Units: 4* *Moderate Income Units: 7*
Restaurant/Cafe	Approximately 6,720 square feet (sf) of restaurant and cafe uses	3,983 square feet of restaurant and cafe uses
Live/Work	Approximately 4,708 sf of live/work use	15,494 square feet of live/work use (12 units)
Retail	27,840 sf of retail uses	14,488 square feet of retail space, a 3,643 square foot hair salon
Office	None	6,711 square feet of creative office space
	Commercial and live/work uses would be on the first two floors and residential units would be on levels 3, 4, and 5	
Parking	Four levels of parking with 308 vehicle parking spaces as well as 45 bicycle parking spaces	Three levels of parking with 346 vehicle parking spaces (which is 10 spaces less than the required

3, cont.

TABLE 1 EVOLVING PROJECT		
	2013	**2021**
		number of spaces for the project) and 133 bicycle parking spaces
Subterranean Levels	One level of the parking structure would be subterranean.	One level of the parking structure would be fully subterranean. The first floor and mezzanine parking levels would be partially subterranean.
Access	Primary commercial access to the project site would be located along Santa Monica Boulevard and primary residential access would be located along West Knoll Drive.	
Source: 2013 NOP and Initial Study and 2021 NOA unless otherwise noted.		

The evolving nature of the project site can be seen by comparing **Figure 1 and Figure 2**, below.

3, cont.

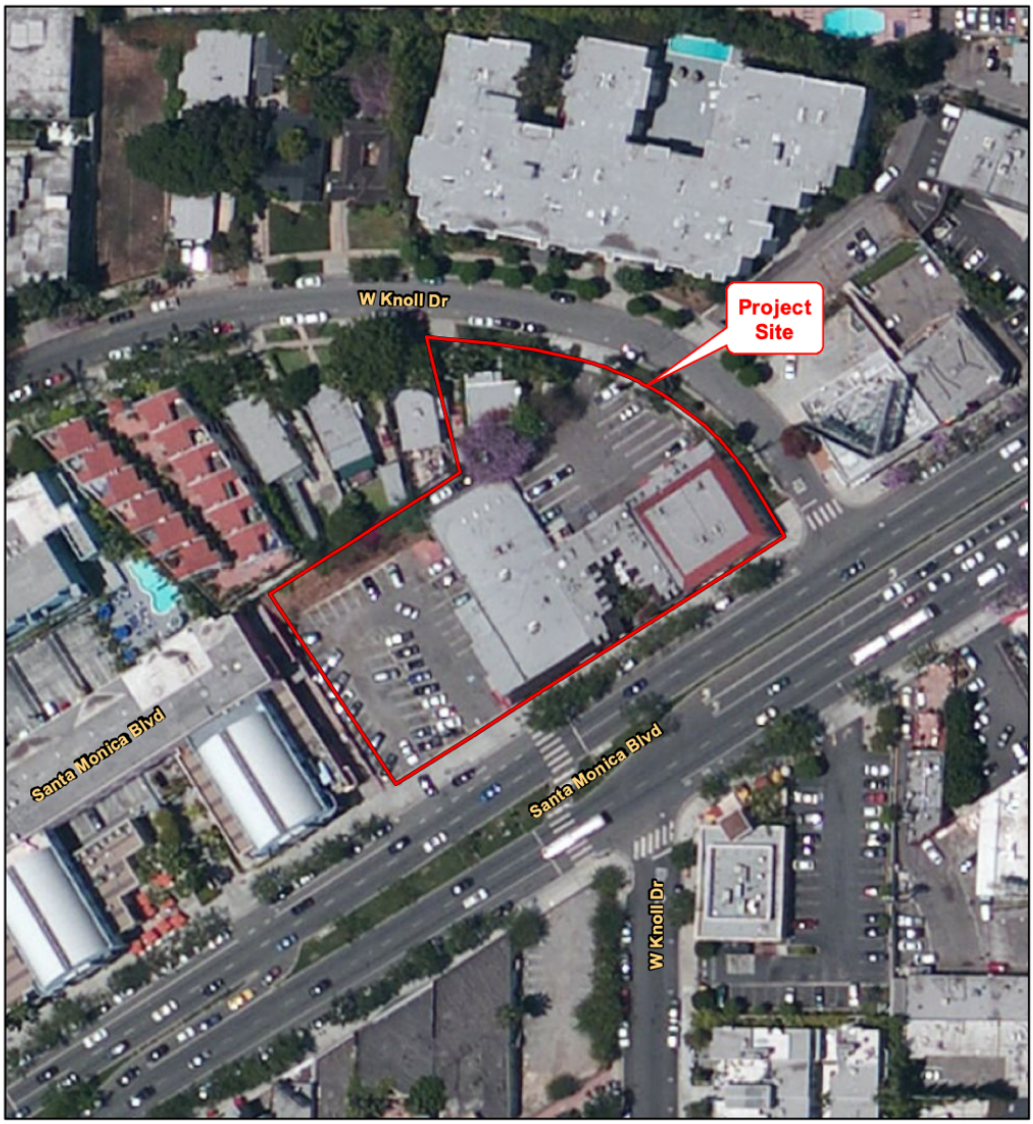


FIGURE 1 - NOP VERSION – 2013 DEVELOPMENT PROPOSAL
Source: 2013 Initial Study

3, cont.

Figure 2-2 Project Location

FIGURE 2 - PROJECT SITE – RDEIR – PROPOSED PROJECT
Source: RDEIR Figure 2-2

Lack of An Accurate, Stable and Finite Project Description

The courts have held that an accurate and stable project description is fundamental to a legally sufficient EIR. This was first explained in *County of Inyo* (1977) 71 Cal.App.3d 185:

> An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.[12]
>
> A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.[13]

4

As further explained by the courts:

> This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading. [Citation.] 'Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal i.e., the "no project" alternative[], and weigh other alternatives in the balance.' [Citation.][14]
>
> "[W]hen an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified." [15]
>
> A project description that omits, or allows modification of, significant integral components of the project will result in an EIR that fails to disclose the actual impacts of the project.[16]

The more than eight-year history of the continuing CEQA process for 8555 Santa Monica Boulevard is a clear example of an EIR process where the project description is neither accurate nor stable. The RDEIR, contains just one more step in the evolving development description. As such the RDEIR and the City's CEQA process is fatally flawed.

---

[12] *County of Inyo* (1977) 71 Cal.App.3d 185, at 192–193
[13] *County of Inyo* (1977) 71 Cal.App.3d 185, at p. 198.
[14] Citizens for a Sustainable *Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, at p. 1052
[15] *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656
[16] *Santiago County Water District v. County of Orange* (1981) 118 Cal App 3d 818

Failure to Proceed In the Manner Proscribed By Law

When the EIR process that the City began in 2013 did not result in a project approval following completion on the May 2018 FEIR, the City should have rejected the project, pending redesign and required the applicant submit a new project application. CEQA Guidelines Section 15108 requires that an EIR be completed within one year and 90 days:

> **15108. COMPLETION AND CERTIFICATION OF EIR**
>
> With a private project, the Lead Agency shall complete and certify the final EIR as provided in Section 15090 within one year after the date when the Lead Agency accepted the application as complete. Lead Agency procedures may provide that the one-year time limit may be extended once for a period of not more than 90 days upon consent of the Lead Agency and the applicant.
>
> Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21100.2 and 21151.5, Public Resources Code; Government Code Section 65950.

5

The City should have required a new NOP and started the CEQA process de novo for the revised version of the development improperly addressed in the RDEIR. Instead even though the FEIR had been released approximately 3 years and five months prior, the City proceeded with an RDEIR for the revised Project. In so doing the City is relying on an NOP issued on April 12, 2013 for the current RDEIR which was issued on October 14, 2021. The RDEIR was thus issued 8 years, 6 months and 3 days after the issuance of the NOP. After an extensive passage of time and multiple revisions to the proposed development the CEQA process is still not complete.

The City should have denied the project application when it was clear that the applicant did not intend to go forward with the development as proposed in 2013, or described in the 2017 DEIR, or described in the 2018 FEIR, rather than indefinitely extending the CEQA process to allow for multiple project revisions. As noted on pages ES-10 and ES-11 of the DEIR, the version of the development analyzed in the DEIR would result in two significant unmitigated impacts as well as the significant but mitigatable impacts identified in DEIR Table ES-1.

One of the powers granted to public agencies by Article 3 of the CEQA Guidelines is the power to disapprove a project prior to completing the environmental process:

> **15042. AUTHORITY TO DISAPPROVE PROJECTS**
>
> A public agency may disapprove a project if necessary in order to avoid one or more significant effects on the environment that would occur if the project were approved as proposed. A Lead

Agency has broader authority to disapprove a project than does a Responsible Agency. A Responsible Agency may refuse to approve a project in order to avoid direct or indirect environmental effects of that part of the project which the Responsible Agency would be called on to carry out or approve. For example, an air quality management district acting as a Responsible Agency would not have authority to disapprove a project for water pollution effects that were unrelated to the air quality aspects of the project regulated by the district.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21002 and 21002.1, Public Resources Code; Friends of Mammoth v. Mono County, 8 Cal. App. 3d 247; San Diego Trust and Savings Bank v. Friends of Gill, 121 Cal. App. 3d 203.

5, cont.

In *Las Lomas Land Co., LLC v. City of Los Angeles* (2009) 177 Cal. App. 4th 837 the Court held that a City does not have a mandatory duty under CEQA to complete and consider an EIR before rejecting a project. The City thus had the option to deny the proposed Project and should have done so.

CEQA Guidelines Section 15109 also gives the City the power to deny a project based on unreasonable delays:

15109. SUSPENSION OF TIME PERIODS

An unreasonable delay by an applicant in meeting requests by the Lead Agency necessary for the preparation of a Negative Declaration or an EIR shall suspend the running of the time periods described in Sections 15107 and 15108 for the period of the unreasonable delay. **Alternatively, an agency may disapprove a project application where there is unreasonable delay in meeting requests.** The agency may allow a renewed application to start at the same point in the process where the application was when it was disapproved.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21100.2 and 21151.5, Public Resources Code; Carmel Valley View, Ltd. v. Maggini, 91 Cal. App. 3d 318.

Although CEQA Guidelines Section 15109 does allow for a suspension of the time periods due to **unreasonable delays by an applicant in meeting requests by the Lead Agency necessary for the preparation of an EIR**, the applicant's multiple redesigns of their development proposal do not constitute this type of delay. Rather they were delays to benefit the project applicant and were not in response to City requests for environmental information. The applicant was thus not eligible to restart the process where they had left off.

5, cont.

Given the passage of time, the multiple revisions to the development proposal, and the development's identified generation of significant impacts, the City should have denied the prior versions of the development proposal. The applicant was not eligible to have any renewed application start at the same point in the process where the application was when it was disapproved, because the delays and subsequent need to disapprove the project were due to applicant redesigns. The City has failed to proceed in the manner proscribed by law.

The DEIR Fails to Identify Significant Housing Element Consistency Impacts

6

The 2021 proposed Project thus includes more housing units (111 vs 93), but fewer affordable units (17 vs 19) than the 2013 development proposal for the site. In addition, the units have gotten smaller. Only 15.3% of the units would be affordable under the proposed Project vs 20.4% under the 2013 proposal. This is less than the 20% required under the City's Inclusionary Housing program.[17] This is despite the fact that the City's Draft Housing Element notes that:[18]

> West Hollywood has extensive needs for affordable housing. Approximately 42 percent of the City's households earn lower incomes. As of 2021, West Hollywood has approximately 16,581 rent stabilized units and 1,056 publicly assisted rental housing units. In addition, 720 households in the City are recipients of Section 8 Housing Choice Vouchers. With rising housing costs in the region, the City must make all feasible efforts to protect its affordable housing stock. Housing options available to the City's workforce, older adults, persons with disabilities, lower income families, and other persons with special needs remain limited. Ownership housing is beyond the reach of most lower and moderate income households in the community.

The percentage of affordable units included in the proposed Project is inconsistent with the City's Regional Housing Needs Assessment (RHNA) housing production targets which include a 62% affordable housing target (very low, low, and moderate income units):[19]

> For the sixth cycle Housing Element update, the City has been allocated a Regional Housing Needs Assessment (RHNA) of 3,933 units:
>
> - Very Low Income: 1,066 units (27.1 percent)
> - Low Income: 689 units (17.5 percent)

[17] See Municipal Code Section 19.22.030. See also: https://www.weho.org/city-government/rent-stabilization-housing/housing/finding-affordable-housing/inclusionary-housing

[18] Page 11-4 of the Draft Housing Element available at: https://wehohousing.rinconconsultants.com/wp-content/uploads/2021/07/Draft-Housing-Element.pdf

[19] Ibid. page 11-14.

- Moderate Income: 682 units (17.4 percent)
- Above Moderate Income: 1,496 units (38.0 percent)

6, cont.

The proposed Project would thus work against the City's RHNA goals, yet the RDEIR fails to address this issue, address the proposed Project's lack of consistency with the Housing Element and Draft Housing Element, the Municipal Code, or to identify this lack of consistency as a significant land use plan consistency impact. The existing RDEIR thus fails to identify a significant impact of the proposed Project.

Additional Issues

Finally, the proposed Project, as currently designed, has the following environmental impacts that must be addressed.

(1) Geo-technical and water table issues that can affect the stability of the project;
(2) Geotechnical and water table issues that will affect the stability of the property at 8562 West Knoll Drive, including subjacent support issues and the unique impacts that may arise from the placement of the project in such a way that it bounds portions of 8562 on more than 270 degrees;

7

(3) Provisions must be made to ensure engineering integrity, but also to protect the residential homeowners from the consequences of catastrophic failure of the soil, including insurance and bonding that provides financial protection; provision for temporary housing for the residents of 8562 during the period of digging and construction of a massive subterranean parking garage; as well as the building of the massive, potentially destabilizing 55 foot tall structures immediately adjacent to the hillside lot of 8562.
(4) We note that very little engineering has been done on the project. We strongly recommend that in the absence of a clearly defined plan that provides for a safe construction process, and ensures a safely completed project, the project should not be allowed to advance. The engineering and planning documents must take account of the significant risks to 8562 and should involve 8562 in the plan.
(5) As we previously noted, the shadow studies, which were only visible at a resolution of 12 drawings on an 8 ½ x 11 piece pf paper, significantly contradict many of the other drawings and renderings in various project documents. We request that a more thoughtful shadow analysis be completed. One significant issue unaddressed by the analysis relates to the unique design of 8562. In 8562, the bedrooms are on the bottom floor of the buildings. So renderings that show the upper 25 % of the site free of shade only promise sun to rooftop decks and the upper portions of a lofty living area. **In some units, the sun would not be anywhere near the floor area where people live.** Surely the shade analysis must be reconsidered to account for a building design that means that many people will live significantly in shade.

8

9

(6) Construction accommodations – The project will generate massive amounts of dust and debris, both above and below. Our buildings will require repainting, as well as regular interior and exterior cleaning during construction.

10 (7) A sound barrier might assist in mitigating the noise from the project, a particular salient issue because several of our residents are working from home, since the pandemic.

(8) The setbacks do not appear to be significant on the Western and Northern walls of the project. The bedrooms of many of our units face directly into a large solid wall. We note that the design appears to have been modified to preserve the
11 marketability of several rooms in the Ramada Hotel. Several of our owners rent their units and will be similarly affected ion an economic sense. The most recent design appears to have several large walls (the one immediately East of 8562, for example) as well as several straight, shorter walls that are problematic.

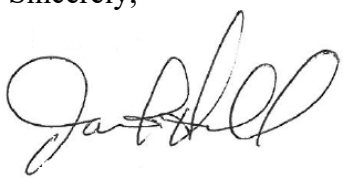
Conclusion

There are problems with the analysis contained in the RDEIR. It fails to identify significant land use plan consistency issues.

The City has failed to proceed in the manner proscribed by law. The environmental
12 process for the proposed development at 8555 Santa Monica Boulevard is not consistent with CEQA process requirements, and is a clear example of an evolving EIR with a lack of an accurate, stable and finite project description. The City must therefore stop what it is doing, deny the prior version of the project, start a new CEQA process for the proposed Project, issue the required Notice of Preparation (NOP) and complete the NOP process before issuing a Draft EIR ("DEIR") for the proposed Project.

I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Letter 28

COMMENTER: Jamie T. Hall, Channel Law Group, LLP

DATE: November 29, 2021

Response 28.1

The commenter states that they represent the North West Knoll Drive Association and requests that the City include all documents cited in comment letters in the Administrative Record. The commenter also requests that Channel Law Group, LLP be added to the list of interested persons to receive all notices related to this project.

As required by CEQA, referenced documents will be included in the Administrative Record. To the extent that hyperlinks contained in comment letters navigate the reader directly to a specific document, the City will provide those documents. However, in the event that a hyperlink leads the reader to a general website, the City is not required to "spend time searching for documents that the commenter asserts can be found through a general Web site." *Consolidated Irrigation Dist. v. Superior Court*, 205 Cal. App. 4th 697, 724 (2012).

Channel Law Group, LLP has been added to this list of interested persons to receive all notices related to this project.

Response 28.2

The commenter sets forth an excerpt from the October 18, 2021 Notice of Availability ("NOA") for the Recirculated Draft EIR for the project regarding the project history. The commenter claims the environmental process for the proposed project is not consistent with CEQA because it is an evolving EIR with a lack of an accurate stable and finite project description. The commenter states that the City should deny the project and start the CEQA process again with an NOP and new Draft EIR.

While the quoted portion of the NOA is correctly stated, it is an incomplete statement of the project's history. A more complete statement of the project's history can be found on pages 1-1 through 1-6 of the Recirculated Draft EIR. In addition to the residential lots added to the project, the project has also evolved to respond to and incorporate comments from the public, as well as design input from the City's Design Review Subcommittee.

The commenter cites to no legal authority to support its claim that the City was required by law to deny the project and start the EIR process again from the beginning. To the contrary, the CEQA Guidelines specifically delineate the procedure necessary when a project undergoes changes during the environmental review process. Section 15088.5(a) of the California Code of Regulations states, "A lead agency is required to recirculate an EIR when *significant new information* is added to the EIR … [emphasis added]." Thus, when "significant new information" is added to the EIR, CEQA requires that the EIR be recirculated and does not require termination of the CEQA process. While the CEQA's "significant new information" is a minimum standard for recirculation, it is not a limit on the types or extent of information that would qualify for a recirculated EIR. Section 15088.5 expressly states that the term "information" can "***include changes in the project*** … or environmental setting as well as

additional data or other information [emphasis added]." See, e.g., *Save Civita Because Sudberry Won't v. City of San Diego*, 72 Cal.App.5th 957, 979 (2021) (recirculated EIR upheld – "significant new information" can "include changes in the project").

The purpose of the Recirculated Draft EIR is to address the changes to the project that occurred after the original Draft EIR circulation. The project analyzed in the Recirculated Draft EIR is what the applicant is currently proposing and the analyses contained in the Recirculated Draft EIR have been updated to reflect the current proposal. The requirement that a project description be consistent throughout an EIR does not mean that the project cannot change as it proceeds through CEQA review and other stages in the approval process. As noted in *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199 (a case cited by the commenter), "The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." If the project is changed such that significant new information is added to the EIR after notice of public review has been given, but before final certification of the EIR, the City must issue a new notice and recirculate the EIR for comments under Public Resources Code § 21092.1. That is exactly what was done here. The City issued a Notice of Availability for the Recirculate Draft EIR on October 14, 2021 for the requisite 45-day comment period ending November 29, 2021.

Therefore, the process followed is consistent with CEQA requirements. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 28.3

The commenter provides further details related to the CEQA process for the proposed project.

The commenter's description of the process for the proposed process appears to be generally accurate. However, the commenter's Table 1 fails to discuss the project characteristics that were analyzed in the 2017 DEIR.

Issuance of an Initial Study and the NOP on April 12, 2013: The commenter is correct that the NOP was issued on April 21, 2013. Although not required since the NOP was issued in 2013, the cumulative projects list was updated in 2015. A second community scoping meeting was held in August 2016.

Release of the Draft EIR ("DEIR") dated July 2017: The commenter is correct that the DEIR was released was dated July 2017 and included an Initial Study as Appendix A which was dated July 2017 and includes a signature page from April 11, 2013 on page 5. The signature page includes the following clarifying note: "A Notice of Preparation (NOP) of an environmental impact report, along with this Initial Study, was distributed for a 30-day agency and public review period on April 12, 2013. Since then, the applicant added two residential lots along West Knoll Drive to the project site and revised the proposed project, also incorporating modifications to address some of the neighborhood issues raised. Compared to the original proposal, the revised project reduced the amount of restaurant and retail space (from 6,720 sf and 27,840 sf to 2,810 sf and 15,678 sf respectively), increased the number of live/work units

(from five to twelve), added creative office space (6,079 sf), added a hair salon (3,718 sf), and reduced the number of driveways on West Knoll Drive from two o one. The revised project also increased the number of apartment units from 95 units to 97 units. This Initial Study has been updated to reflect these revisions."

Release of an FEIR dated May of 2018: The commenter is correct that the City released a Final EIR ("FEIR") in May of 2018. The commenter states that it "is unknown what action, if any, was taken on the FEIR." Because the project spans multiple legal lots, a lot tie is required to hold the lots together under one owner for the purpose of creating a single building site. At the time of the issuance of the DEIR and the FEIR, the project site encompassed 55,138 sf. Because Section 19.36.170(A)(1) of the West Hollywood Municipal Code required the lots to have a minimum aggregate area of 60,000 square feet in order to qualify for a lot tie, the applicant requested, pursuant to Government Code section 65915(e)(1), a waiver or reduction of this development standard that would "have the effect of physically precluding the construction of the project at the densities or with the incentives permitted under the statute."

At the March 7, 2019 Planning Commission hearing on the FEIR, a motion was passed to continue any decision on the project so that Planning staff could perform additional analysis regarding the question of whether requiring the project site to have a minimum aggregate site area of 60,000 square feet would physically preclude the construction of the project with the densities and concessions requested by the project applicant. The hearing on the project was continued to a date uncertain.

Because the project site now encompasses an aggregate area of 61,097 square feet, a waiver of this development standard is no longer required.

An Initial Study dated September 9, 2019: The comment references the release of an Initial Study dated September 9, 2019 prepared by Dudek. In support of this contention, the commenter provides a link which directs the reader to an initial study for a project at 8850 Sunset Boulevard, not an initial study for the project at issue in the Recirculated Draft EIR. There was no Initial Study dated September 2019 prepared for this project.

Release of the Recirculated Draft EIR dated October 2021: The commenter is correct that the NOA for the Recirculated Draft EIR was issued on October 14, 2021 and the public comment period for the FEIR ended on November 29, 2021. The commenter notes that it had requested an extension of the public comment period which had been denied. The commenter cites to no authority that would support an argument that the City was required to grant a request to extend the public comment period. Pursuant to Section 21091(a) of the Public Resources Code, the City was required to provide a 30-day public review period. The City exceeded this requirement by 16 days.

The comment states that there is no evidence of the issuance of any NOP, other than the April 12, 2013 NOP. The commenter cites to no authority to support its position that the City was required to issue a new NOP. The City was only required to issue a new NOA pursuant to Section 21092.1 of the Public Resources Code. A NOP must be issued "[i]mmediately after [a lead agency] decid[es] that an environmental impact report is required for a project." 14 CCR 15082. The City issued its NOP when it determined that an EIR was required for this project in 2013. "The purpose of the notice is to solicit guidance from those agencies as to the scope and

content of the environmental information to be included in the EIR." 14 CCR 15375. The City's issuance of the April 2013 NOP achieved its purpose – the public was afforded the opportunity to comment on the scope of the EIR and those comments were responded to. Thereafter, the public was able to comment on both the DEIR and now the Recirculated Draft EIR. As such, the City has fulfilled its obligations under CEQA. *Bozung v. Local Agency Formation Com.*, 13 Cal. 3d 263, 283 (1975) ("The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind.").

The Recirculated Draft EIR was recirculated in accordance with CEQA requirements because of the project changes noted in the comment and to provide additional opportunity for public and agency comment on the Draft EIR. No additional or more severe unavoidable impacts were identified in the Recirculated Draft EIR.

Response 28.4

The commenter claims that the Recirculated Draft EIR lacks an accurate, stable, and finite project description because of the more than eight-year history of the CEQA process for the project.

Section 15088.5(a) of the California Code of Regulations explicitly allows for project modifications without having to restart the EIR process, so long as the lead agency provides the public the right to review and comment on these modifications. 14 CCR 15088.5(a) ("As used in this section, the term 'information' can include changes in the project …"). Because CEQA contemplates the possibility of projects modifications in the middle of environmental review, this necessarily means that project descriptions may also change. The project description in the Recirculated Draft EIR is consistent throughout and with the project plans as they exist today, and therefore, the project description is accurate and stable. *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 199 (1977) ("The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.").

The Recirculated Draft EIR identifies and accurately describes the proposed project in Section 2.0, *Project Description*. Further, Appendix B to the Recirculated Draft EIR includes Site Plans, Elevations, Renderings, and Landscape Plan. See also Response 28.2.

Response 28.5

The commenter claims that the Recirculated Draft EIR fails to proceed in the matter prescribed by law and provides the opinion that the City should have rejected the project and required a new project application and then reissued the NOP and started the CEQA process de novo. In support of this opinion, the commenter cites to Section 15108 of the California Code of Regulations which states that an EIR must be completed and certified within one year. The commenter also cites to Section 15042 of the California Code of Regulations which states that a public agency may disapprove a project if necessary, in order to avoid one or more significant effects on the environment.

Please see Response 28.2. The commenter has provided no basis for the contention that the original proposal should have been denied and the CEQA process re-started. Section 15088.5(a) of the California Code of Regulations explicitly allows for project modifications without having

to restart the EIR process, so long as the lead agency provides the public the right to review and comment on these modifications through a recirculated EIR. 14 CCR 15088.5(a) ("As used in this section, the term 'information' can include changes in the project …"). Because CEQA contemplates the possibility of projects modifications in the middle of environmental review, this necessarily means that an environmental review process may go beyond the one-year time period specified in Section 15108, so long as the requirements in Section 15088.5(a) are met. Notably, Section 15108 does not address any time limit for a recirculated EIR.

The one-year time limit set forth in Section 15108 of the California Code of Regulations is not meant to be used to the detriment of an applicant. Rather, it is intended to be used to protect a project applicant from undue delay by a lead agency in preparing an EIR. The one-year time limit cited by the commenter is not an "ironclad, one-size-fits-all rule that permits no exception," and "it [] cannot be used to halt the decisionmaking process specified by CEQA that is still ongoing." *Schellinger Brothers v. City of Sebastopol*, 179 Cal. App. 4th 1245, 1250 (2009) (holding that the developer's "active participation in that process for more than three years – which included numerous changes in the size and composition of the project" was an acceptable ground to relax the deadline requirements); *see also Riverwatch v. County of San Diego*, 76 Cal. App. 4th 1428, 1441 (1999) (CEQA time limits "are directory rather than mandatory"). The applicant has actively participated in the project's environmental review process since its inception in 2013. Additionally, during the CEQA process for this project, SB 743 was signed into law, which mandated that cities replace the prior traffic impact analysis metric, LOS, with VMT. The traffic analysis that was performed for this project needed to be redone following the City's adoption of the VMT methodology, thus extending the length of the project's environmental review period.

The commenter cites to Section 15042 of the California Code of Regulations in support of the contention that the City had the authority to, and should have, disapproved of the project before the environmental review process was complete. The commenter does not explain why the City should have exercised its purported authority to disapprove of a project in the middle of the environmental process. As described above, the City is not required to disapprove of a project due to project modifications. To the contrary, because the project consists of more than two-thirds residential units, it falls under the protections of the Housing Accountability Act ("HAA"). Gov't Code § 65589.5(h)(2)(B). Because of this, the City may only disapprove of the project once it finds that the project "would have a specific, adverse, and unavoidable impact on public health or safety." *California Renters Legal Advocacy & Education Fund v. City of San Mateo*, 68 Cal. App. 5th 820, 835 (2021). The City has not made this finding.

Response 28.6

The commenter states that the project includes more housing units and less affordable units than the 2013 development proposal. The commenter also contends that only 15.3% of the units would be affordable under the proposed project versus 20.4% under the 2013 project proposal. The commenter contends that this is less than the 20% of affordable housing required under the City's Inclusionary Housing program, despite the fact that the City's Draft Housing Element puts an emphasis on providing affordable housing. The commenter also states that the percentage of affordable units included in the project is inconsistent with the City's Regional Housing Needs Assessment ("RHNA") housing production targets which include a 62% affordable housing target.

The commenter calculates the percentage of affordable housing units for purposes of the City's Inclusionary Housing Program by using the total number of units for the project, including the density bonus. This is incorrect. The percentage of affordable housing units is calculated based on the baseline number of units prior to the application of the density bonus. As described on page 4.4-8 of the Recirculated Draft EIR, there are 12 affordable housing units in the CC1 zone of the project and 60 baseline units. Therefore, the percentage of affordable housing units in this portion of the project is 20%. In the R4B zone of the project, there are 5 affordable housing units and 22 baseline units. Therefore, the percentage of affordable housing units in this portion of the project is 20%. As such, the project's number of affordable housing units complies with the Inclusionary Housing Program. Also, see Response 12.5.

With respect to the project's consistency with the City's Housing Element, the City is currently undergoing the process of updating the City's 6th Cycle 2021-2029 Housing Element and it has not yet been adopted and was not adopted at the time the Recirculated Draft EIR was available for public comment. As discussed in Section 4.4, *Land Use and Planning,* of the Recirculated Draft EIR, the proposed project would be consistent with the City's adopted affordable housing requirements. Further, Section 4.4 evaluates the proposed project's consistency with applicable land use policies adopted for the purposes of mitigating an environmental impact in accordance with Appendix G of the State CEQA Guidelines.

The project is consistent with both Goal H-1 and Goal H-3 of the City's Housing Element, which emphasize the need to "provide affordable rental housing" and to "encourage a diverse housing stock to address the needs of all socioeconomic segments of the community." Additional detail regarding the project's consistency with the City's Housing Element can be found on page 4.4-13 of the Recirculated Draft EIR.

With respect to the commenter's assertion that the project is inconsistent with the City's RHNA housing production targets, as described in the Recirculated Draft EIR, the project involves a mixed-use structure that would add 111 new residential units to the City's housing stocking, including 94 market rate units, 7 moderate-income units, 4 low-income units, and 6 very low-income units. As such, the project assists the City in meeting its RHNA requirements by putting multi-family residential housing in a location containing single-family residences and by placing housing near neighborhood-serving uses and public transportation. It is unclear if the commenter is arguing that the project is required to have 62% of affordable housing in order to be consistent with RHNA. If this is the case, the commenter is incorrect. The 62% affordable housing units figure is the cumulative amount of affordable housing that the City must have, not the amount of affordable housing that each housing development must have.

Response 28.7

The commenter states that geotechnical and water table issues would affect the project and nearby projects, that insurance and bonding is required, and that very little engineering has been done on the project.

Please see Responses 9.1, 10.4, 12.9, and 17.1.

Response 28.8

The commenter states that the shadow studies were not readable and that they contradict other previous shadow analyses.

Please Response 6.1. Updated shadow modeling for with higher-quality images for readability have been included in Figure 1-1 of the Final EIR. As discussed in Response 6.1, the shadow analysis is provided for informational purposes only and the shadow modeling found that shadows would not be cast onto light-sensitive uses for extended periods of time and would not completely cover any adjacent land uses.

Response 28.9

The commenter states that the project would generate massive amounts of dust and debris and that adjacent buildings will require repairing and regular cleaning.

Please see Response 10.9.

Response 28.10

The commenter suggests that a sound barrier might assist in mitigating the noise impact from the project.

The Recirculated Draft EIR includes a range of mitigation measures to reduce construction noise to the degree feasible. These include requirements pertaining to the location of vehicle staging, use of sound mufflers on construction equipment, shrouding/shield of noise-generating equipment, limitations of engine idling and workers' radios, use of smart back-up alarms, and provision of a phone number that neighbors can call with noise complaints throughout grading and construction. Nevertheless, as noted in the Recirculated Draft EIR, these measures cannot assure that noise could be reduced to 10 dBA over ambient noise levels so the temporary construction noise impact would be significant and unavoidable. With respect to noise barriers, a noise barrier at the northernmost project boundary of 15-20 feet may break the line of sight between the project and the residences to the north. However, the effectiveness of noise barriers depends on a variety of factors. In addition, a noise barrier of sufficient height to break the line-of-site between the proposed project and the Ramada Plaza may not be feasible. Lastly, the City considers other factors, such as seismic safety and aesthetic impacts, when determining the feasibility of noise barriers as construction noise mitigation. Nonetheless, the City acknowledges that the use of a sound barrier may be appropriate for this project and could reduce noise levels below a level of significance for certain receptors. Therefore, a mitigation measure requiring a temporary sound barrier (if feasible) during construction has been added to the Final EIR. Revisions are included below and in Section 4.5, *Noise,* of the Final EIR. Nonetheless, even with addition of this mitigation measure, impacts would remain significant and unavoidable.

> **N-1(h) Sound Barriers.** During the shoring phase of construction (after installation of soldier piles in the ground), the applicant shall erect temporary noise barriers along the boundaries of the project site adjacent to the Ramada Plaza Hotel and the multi-family residential uses at 8562 West Knoll. The noise barriers shall be at least 15 feet in

> height and constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class (STC) 32 or higher. The location, height, and type of barrier used shall be approved by City of West Hollywood prior to approval of a grading permit. During the building construction phase, temporary sound barriers or mobile sound barriers may be used as appropriate to attenuate construction noise near noise-generating equipment including grading/excavation equipment used on-site.

Response 28.11

The commenter suggests that the setbacks do not appear to be significant on the western and northern walls of the project and that the design involves several large, straight walls that are problematic.

The portion of the project in the commercial zone has rear setbacks of 10 feet and 25 feet and side setbacks of 5 feet and 15 feet. No front setback is required. The portion of the project in the residential zone has a front setback of 14 feet and ¼ inches and a side setback of 8 feet. No rear setback is required. These setbacks are consistent with the zoning and General Plan requirements. As discussed in Section 1.0, *Introduction,* of the Draft EIR and in Response 6.1, the proposed project would not result in significant aesthetic impacts. Nonetheless, the commenter's opinions on the project design are noted. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 28.12

The commenter summarizes their conclusions that the project fails to identify significant land use plan consistency issues and has failed to proceed in the manner proscribed by law. The commenter states the City must deny the project and start a new CEQA process for a new project.

Please see Responses 28.1 through 28.11 for specific responses to issues raised.

Letter 29

P: (626) 381-9248
F: (626) 389-5414
E: info@mitchtsailaw.com

Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA E-MAIL

November 29, 2021

Laurie Yelton
City of West Hollywood
8300 Santa Monica Boulevard
West Hollywood, CA 90069
Em: lyelton@weho.org

RE: Recirculated Draft Environmental Impact Report for the 8555 Santa Monica Boulevard Mixed-Use Project (SCH No. 2013041041)

Dear Laurie Yelton,,

On behalf of the Southwest Regional Council of Carpenters ("**SWRCC**" or "**Southwest Carpenters**"), my Office is submitting these comments on the City of West Hollywood's ("**City**" or "**Lead Agency**") Recirculated Draft Environmental Impact Report ("**EIR**" or "**DEIR**") (SCH No. 2013041041) for the 8555 Santa Monica Boulevard Mixed-Use Project ("**Project**").

1 The Southwest Carpenters is a labor union representing more than 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project's environmental impacts.

The Southwest Carpenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

SWRCC incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City*

of Woodland (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project's environmental documentation may assert any issue timely raised by other parties).

Moreover, SWRCC requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act ("**CEQA**"), Cal Public Resources Code ("**PRC**") § 21000 *et seq*, and the California Planning and Zoning Law ("**Planning and Zoning Law**"), Cal. Gov't Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

The City should require the Applicant provide additional community benefits such as requiring local hire and use of a skilled and trained workforce to build the Project. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

1, cont.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

2

> [A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

2, cont.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

> . . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California's workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.[1]

Recently, on May 7, 2021, the South Coast Air Quality Management District found that the "[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component" can result in air pollutant reductions.[2]

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to "promote local hiring . . . to help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions."[3]

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City "[c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint

[1] California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf

[2] South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10

[3] City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

2, cont.

labor-management training programs, . . ."[4] In addition, the City of Hayward requires all projects 30,000 square feet or larger to "utilize apprentices from state-approved, joint labor-management training programs."[5]

Locating jobs closer to residential areas can have significant environmental benefits. As the California Planning Roundtable noted in 2008:

> People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.[6]

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.[7] Some municipalities have tied local hire and skilled and trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

> In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing." The city's First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When

[4] City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf.

[5] City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

[6] California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* https://cproundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf

[7] Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? Journal of the American Planning Association 72 (4), 475-490, 482, *available at* http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf.

2, cont.

needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

3

The City should also require the Project to be built to standards exceeding the current 2019 California Green Building Code to mitigate the Project's environmental impacts and to advance progress towards the State of California's environmental goals.

I. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

A. Background Concerning the California Environmental Quality Act

CEQA has two basic purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. 14 California Code of Regulations ("**CCR**" or "**CEQA Guidelines**") § 15002(a)(1).[8] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made. Thus, the EIR 'protects not only the environment but also informed self-government.' [Citation.]" *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564. The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal. App. 4th 1344, 1354 (*"Berkeley Jets"*); *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810.

4

Second, CEQA directs public agencies to avoid or reduce environmental damage when possible by requiring alternatives or mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). *See also, Berkeley Jets,* 91 Cal. App. 4th 1344, 1354; *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553; *Laurel Heights Improvement Ass'n v.*

[8] The CEQA Guidelines, codified in Title 14 of the California Code of Regulations, section 15000 *et seq*, are regulatory guidelines promulgated by the state Natural Resources Agency for the implementation of CEQA. (Cal. Pub. Res. Code § 21083.) The CEQA Guidelines are given "great weight in interpreting CEQA except when . . . clearly unauthorized or erroneous." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

Regents of the University of California (1988) 47 Cal. 3d 376, 400. The EIR serves to provide public agencies and the public in general with information about the effect that a proposed project is likely to have on the environment and to "identify ways that environmental damage can be avoided or significantly reduced." CEQA Guidelines § 15002(a)(2). If the project has a significant effect on the environment, the agency may approve the project only upon finding that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns" specified in CEQA section 21081. CEQA Guidelines § 15092(b)(2)(A–B).

4, cont.

While the courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position.' A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" *Berkeley Jets*, 91 Cal. App. 4th 1344, 1355 (emphasis added) (quoting *Laurel Heights,* 47 Cal. 3d at 391, 409 fn. 12). Drawing this line and determining whether the EIR complies with CEQA's information disclosure requirements presents a question of law subject to independent review by the courts. *Sierra Club v. Cnty. of Fresno* (2018) 6 Cal. 5th 502, 515; *Madera Oversight Coalition, Inc. v. County of Madera* (2011) 199 Cal. App. 4th 48, 102, 131. As the court stated in *Berkeley Jets*, 91 Cal. App. 4th at 1355:

> A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process.

The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences and, equally important, that the public is assured those consequences have been considered. For the EIR to serve these goals it must present information so that the foreseeable impacts of pursuing the project can be understood and weighed, and the public must be given an adequate opportunity to comment on that presentation before the decision to go forward is made. *Communities for a Better Environment v. Richmond* (2010) 184 Cal. App. 4th 70, 80 (quoting *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449–450).

B. CEQA Requires Revision and Recirculation of an Environmental Impact Report When Substantial Changes or New Information Comes to Light

Section 21092.1 of the California Public Resources Code requires that "[w]hen significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 … but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report" in order to give the public a chance to review and comment upon the information. CEQA Guidelines § 15088.5. 5

Significant new information includes "changes in the project or environmental setting as well as additional data or other information" 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)." CEQA Guidelines § 15088.5(a). Examples of significant new information requiring recirculation include "new significant environmental impacts from the project or from a new mitigation measure," "substantial increase in the severity of an environmental impact," "feasible project alternative or mitigation measure considerably different from others previously analyzed" as well as when "the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." *Id.*

An agency has an obligation to recirculate an environmental impact report for public notice and comment due to "significant new information" regardless of whether the agency opts to include it in a project's environmental impact report. *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74, 95 [finding that in light of a new expert report disclosing potentially significant impacts to groundwater supply "the EIR should have been revised and recirculated for purposes of informing the public and governmental agencies of the volume of groundwater at risk and to allow the public and governmental agencies to respond to such information."]. If significant new information was brought to the attention of an agency prior to certification, an agency is required to revise and recirculate that information as part of the environmental impact report.

C. Due to the COVID-19 Crisis, the City Must Adopt a Mandatory Finding of Significance that the Project May Cause a Substantial Adverse Effect on Human Beings and Mitigate COVID-19 Impacts

CEQA requires that an agency make a finding of significance when a Project may cause a significant adverse effect on human beings. PRC § 21083(b)(3); CEQA Guidelines § 15065(a)(4).

Public health risks related to construction work requires a mandatory finding of significance under CEQA. Construction work has been defined as a Lower to High-risk activity for COVID-19 spread by the Occupations Safety and Health Administration. Recently, several construction sites have been identified as sources of community spread of COVID-19.[9]

6

SWRCC recommends that the Lead Agency adopt additional CEQA mitigation measures to mitigate public health risks from the Project's construction activities. SWRCC requests that the Lead Agency require safe on-site construction work practices as well as training and certification for any construction workers on the Project Site.

In particular, based upon SWRCC's experience with safe construction site work practices, SWRCC recommends that the Lead Agency require that while construction activities are being conducted at the Project Site:

Construction Site Design:

- The Project Site will be limited to two controlled entry points.
- Entry points will have temperature screening technicians taking temperature readings when the entry point is open.
- The Temperature Screening Site Plan shows details regarding access to the Project Site and Project Site logistics for conducting temperature screening.
- A 48-hour advance notice will be provided to all trades prior to the first day of temperature screening.

[9] Santa Clara County Public Health (June 12, 2020) COVID-19 CASES AT CONSTRUCTION SITES HIGHLIGHT NEED FOR CONTINUED VIGILANCE IN SECTORS THAT HAVE REOPENED, *available at* https://www.sccgov.org/sites/covid19/Pages/press-release-06-12-2020-cases-at-construction-sites.aspx.

6, cont.

- The perimeter fence directly adjacent to the entry points will be clearly marked indicating the appropriate 6-foot social distancing position for when you approach the screening area. Please reference the Apex temperature screening site map for additional details.
- There will be clear signage posted at the project site directing you through temperature screening.
- Provide hand washing stations throughout the construction site.

Testing Procedures:

- The temperature screening being used are non-contact devices.
- Temperature readings will not be recorded.
- Personnel will be screened upon entering the testing center and should only take 1-2 seconds per individual.
- Hard hats, head coverings, sweat, dirt, sunscreen or any other cosmetics must be removed on the forehead before temperature screening.
- Anyone who refuses to submit to a temperature screening or does not answer the health screening questions will be refused access to the Project Site.
- Screening will be performed at both entrances from 5:30 am to 7:30 am.; main gate [ZONE 1] and personnel gate [ZONE 2]
- After 7:30 am only the main gate entrance [ZONE 1] will continue to be used for temperature testing for anybody gaining entry to the project site such as returning personnel, deliveries, and visitors.
- If the digital thermometer displays a temperature reading above 100.0 degrees Fahrenheit, a second reading will be taken to verify an accurate reading.

6, cont.

- If the second reading confirms an elevated temperature, DHS will instruct the individual that he/she will not be allowed to enter the Project Site. DHS will also instruct the individual to promptly notify his/her supervisor and his/her human resources (HR) representative and provide them with a copy of Annex A.

Planning

- Require the development of an Infectious Disease Preparedness and Response Plan that will include basic infection prevention measures (requiring the use of personal protection equipment), policies and procedures for prompt identification and isolation of sick individuals, social distancing (prohibiting gatherings of no more than 10 people including all-hands meetings and all-hands lunches) communication and training and workplace controls that meet standards that may be promulgated by the Center for Disease Control, Occupational Safety and Health Administration, Cal/OSHA, California Department of Public Health or applicable local public health agencies.[10]

The United Brotherhood of Carpenters and Carpenters International Training Fund has developed COVID-19 Training and Certification to ensure that Carpenter union members and apprentices conduct safe work practices. The Agency should require that all construction workers undergo COVID-19 Training and Certification before being allowed to conduct construction activities at the Project Site.

SWRCC has also developed a rigorous Infection Control Risk Assessment ("**ICRA**") training program to ensure it delivers a workforce that understands how to identify and control infection risks by implementing protocols to protect themselves and all others during renovation and construction projects in healthcare environments.[11]

[10] *See also* The Center for Construction Research and Training, North America's Building Trades Unions (April 27 2020) NABTU and CPWR COVIC-19 Standards for U.S Constructions Sites, *available at* https://www.cpwr.com/wp-content/uploads/publications/NABTU_CPWR_Standards_COVID-19.pdf; Los Angeles County Department of Public Works (2020) Guidelines for Construction Sites During COVID-19 Pandemic, *available at* https://dpw.lacounty.gov/building-and-safety/docs/pw_guidelines-construction-sites.pdf.

[11] For details concerning SWRCC's ICRA training program, *see* https://icrahealthcare.com/.

ICRA protocols are intended to contain pathogens, control airflow, and protect patients during the construction, maintenance and renovation of healthcare facilities. ICRA protocols prevent cross contamination, minimizing the risk of secondary infections in patients at hospital facilities.

6, cont.

The City should require the Project to be built using a workforce trained in ICRA protocols.

II. THE DEIR IMPROPERLY EXCLUDES THE PROJECT FROM VEHICLES MILES TRAVELED TRANSPORTATION AND AESTHETICS ANALYSIS

A. The Project is Not Within a Transit Priority Area Because there Are No Major Transit Stop Within a Half-Mile of the Project Site

California Public Resources Code sections 21099 subd. (d)(1) provides that "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Under PRC Section 21099(b)(3) a transit priority area "TPA" is "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a transportation improvement program or applicable regional transportation plan.

7

."

According to PRC Section 21064.3 "[a] major transit stop means a site containing one of the following:

a. An existing rail or bus rapid transit station
b. A ferry terminal served by either a bus or rail transit service
c. The intersection of two or more bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute"

The DEIR concludes that the Project is located within a transit priority area based upon the Project being located within half a mile of an intersection of two or more bus routes with a frequency of service interval of 15 minutes or less. The DEIR finds that the Project Site is located within 700 feet from the intersection of Santa Monica Boulevard and La Cienega Boulevard, which the DEIR claims is serviced by Metro

Line 4, Metro Rapid Line 704, Metro Line 105 and Metro Rapid Line 705. (DEIR, p. 1-8.)

However, as of November 29, 2021, Metro Rapid Lines 705 and 705 are no longer in service.[12] There are over twenty Metro Rapid lines in Los Angeles County;[13] bus routes 704 and 705 are not in operation. There are no Metro Rapid Line Service within the vicinity of the Project. The DEIR's transportation existing conditions mentions that Los Angeles Metro Local bus routes 2, 4, 105, 10 and 30 could possibly have a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. However, the frequency of service interval for all these bus routes is over 15 minutes even during peak hours. This is shown on the Los Angeles Metro information data. For example, Bus route 2 fails to consistently have a headway of less than 15 minutes during the PM peak hours.[14]

7, cont

The DEIR's material misrepresentation about the existence of Metro Rapid Lines 704 and 705 seriously calls into question the credibility of the City's environmental analysis. The EIR's should be revised and recirculated to analyze whether the Project Site is still within a Transit Priority Area based upon accurate and current information about the public transit facilities that serve the area rather than non-existent imaginary bus lines.

Moreover, the remaining bus routes, including Bus route 4, also fail to have consistent headways of 15 minutes or less during peak hours.[15] This is shown on the General Transit Feed Specification (GTFS) data, which allows public transit agencies, including Los Angeles Metro, to publish their transit data in a format that can be consumed by a wide variety of software applications.

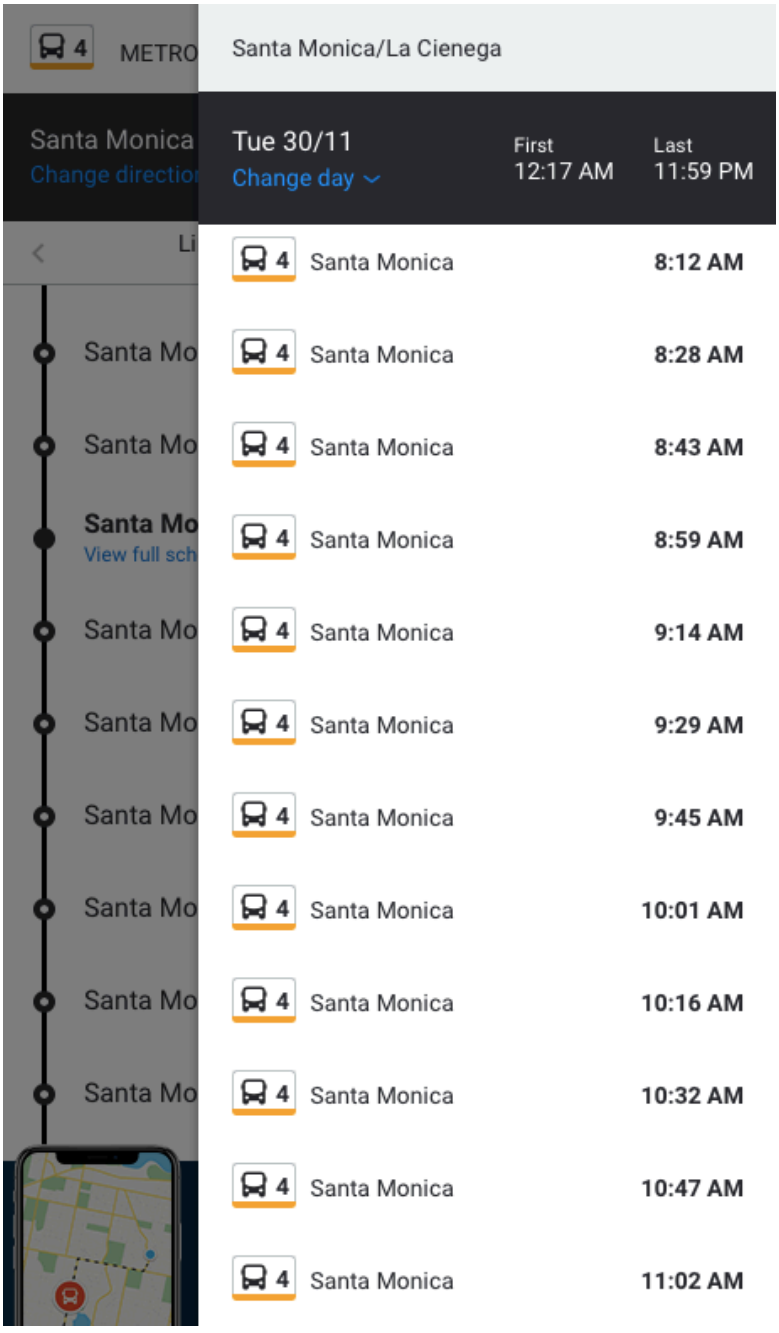
Even when Los Angeles Metro schedule lists bus route headways of less than 15 minutes, they are not accurate, and serve as a service schedule wish list when do not reflect the actual headways provided by the Agency via GTFS.[16]

[12] Los Angeles County Metropolitan Transportation Authority, Maps and Schedules, accessed November 29, 2021, *available at* https://www.metro.net/riding/schedules/ (Exhibit E).
[14] https://media.metro.net/documents/0d888021-6e11-4352-a056-6b0899853809.pdf
[14] https://media.metro.net/documents/0d888021-6e11-4352-a056-6b0899853809.pdf
[15] *See* https://developer.metro.net/gtfs-schedule-data/
[16] *See* https://la.streetsblog.org/2021/10/01/missed-runs-and-crowded-buses-metro-falls-short-of-restoring-full-pre-covid-transit-service/

7, cont.

Also, no planned major transit stop that is within a half-mile of the project is mentioned on DEIR transportation baseline or the Appendix G. Therefore, the project is not within a half-mile of a major transit stop.

GTFS contains real-time information that contain actual bus arrival information, vehicle positions and service advisories. For example, bus route 4 headways for the AM peak hour using Los Angeles Metro GTFS data are shown below:



7, cont. Therefore, the Project is not within a transit priority area and the DEIR must include a vehicle miles traveled analysis.

B. The Transportation Baseline is Deficient

According to PRC Section 15125(a) "An EIR must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than necessary to provide an understanding of the significant effects of the proposed project and its alternatives. The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts"

8

The DEIR's transportation existing conditions and Appendix G lists a series of bus routes. The analysis is deceiving as it portraits that Rapid Bus 704 stops within the vicinity of Project site. This bus route has been discontinued. The DEIR also lists a series of bus routes indicating their peak hour headways are less than 15 minutes, this is not true, Los Angeles Metro transit data shows otherwise.

The DEIR improperly assumes the Project is "presumed to have a less-than-significant VMT impact" (DEIR, Appendix G, Page 3) as well as an exemption from aesthetics and traffic significant effects on the environment based on its parcels being within a transit priority area, these inaccurate statements effectively prevent the public and decision makers to get an accurate picture of the project's lack of transit priority area and major transit stops.

C. The Project is Not Exempted From Evaluating Aesthetic and Parking Environmental Impacts

As discussed above, PRC Section 21099(d)(1) states that aesthetics and parking impacts shall not be considered a significant impact for projects within a TPA. However, this is not to be interpreted as a complete exemption from ever evaluating and analyzing the aesthetics and parking environmental impacts. The EIR must show the actual impacts, they have to be evaluated and analyzed on the EIR in order to allow the lead agency and the public to make an informed decision.

9

PRC Section 15121(a) states that "An EIR is an informational document which will inform the public agency decision makers and the public generally of the significant effects, and describe reasonable alternative to the project."

Without aesthetics and traffic impact analyses, the DEIR violates PRC Section 15121, because it fails to provide specific information regarding the environmental effects associated with development of the Project Site and ways to minimize any significant environmental effects through mitigation measures. Further, the DEIR must have aesthetics and traffic impact analyses so that the impacts are taking in consideration when evaluating and comparing the Project alternatives.

9, cont.

Even if the project is considered to be within a TPA; the EIR must have, at the very least, aesthetics and traffic impact analyses which details whether except as provided in PRC 21099, would the project aesthetics/traffic impact the environment?.

D. The DEIR Fails to Analyze Secondary Parking Impacts

PRC Section 21099(b)(3) states that "This subdivision does not relieve a public agency of the requirement to analyze a project's potentially significant transportation impacts related to air quality, noise, safety, or any other impact associate with transportation. The methodology established by these guidelines shall not create a presumption that a project will not result in significant impacts related to air quality, noise,, safety, or any other impact associated with transportation."

10

For that reason, even when a project's parking impacts are not to be considered a significant pursuant to PRC Section 21099(d)(1); Secondary parking impacts caused by traffic congestion resulting from lack of parking must be addressed. Therefore, the DEIR fails to consider the impacts that parking will have on air quality, noise, safety and, any other impact associated with transportation.

III. THE DEIR IS INADEQUATE

A. The DEIR Improperly Labels Mitigation Measures as "Green Building Features"

The DEIR improperly labels mitigation measures as "Green Building Features" which the DEIR purports will "reduce energy use" (RDEIR, p. 2-16) as well as "reduce water use" (RDEIR, p. 2-16)

11

Relying on the green building features, the DEIR concludes in many instances that the Project's impacts are less than significant and that no mitigation is required.

However, it is established that "'[a]voidance, minimization and / or mitigation measure' . . . are not 'part of the project.' . . . compressing the analysis of impacts and

mitigation measures into a single issue . . disregards the requirements of CEQA." (*Lotus v. Department of Transportation* (2014) 223 Cal. App. 4th 645, 656.)

When "an agency decides to incorporate mitigation measures into its significance determination, and relies on those mitigation measures to determine that no significant effects will occur, that agency must treat those measures as though there were adopted following a finding of significance." (*Lotus, supra*, 223 Cal. App. 4th at 652 [citing CEQA Guidelines § 15091(a)(1) and Cal. Public Resources Code § 21081(a)(1).])

11, cont.

By labeling mitigation measures as green building features, the City violates CEQA by failing to disclose "the analytic route that the agency took from the evidence to its findings." (Cal. Public Resources Code § 21081.5; CEQA Guidelines § 15093; *Village Laguna of Laguna Beach, Inc. v. Board of Supervisors* (1982) 134 Cal. App. 3d 1022, 1035 [quoting *Topanga Assn for a Scenic Community v. County of Los Angeles* (1974) 11 Cal. 3d 506, 515.])

The DEIR's use of "Green Building Features" further violates CEQA because such measures would not be included in the Project's Mitigation Monitoring and Reporting Program CEQA requires lead agencies to adopt mitigation measures that are fully enforceable and to adopt a monitoring and/or reporting program to ensure that the measures are implemented to reduce the Project's significant environmental effects to the extent feasible. (PRC § 21081.6; CEQA Guidelines § 15091(d).) Therefore, using Green Building Features in lieu of mitigation measures violates CEQA.

B. The DEIR Defers the Development of Environmental Mitigation Measures

According to DEIR's Mitigation Measure GS-1 "[p]rior to the commencement of project construction, a Qualified Paleontologist shall be retained to conduct paleontological monitoring during ground-disturbing activities."(DEIR, Appendix A, p. 20.) While the DEIR mentions the requirement of a certified paleontologist in general terms, it fails to commit to specific performance standards.

12

CEQA mitigation measures proposed and adopted into an environmental impact report are required to describe what actions that will be taken to reduce or avoid an environmental impact. (CEQA Guidelines § 15126.4(a)(1)(B) [providing "[f]ormulation of mitigation measures should not be deferred until some future time."].)

While the same Guidelines section 15126.5(a)(1)(B) acknowledges an exception to the rule against deferrals, but such exception is narrowly proscribed to situations where

"measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (Id.) Courts have also recognized a similar exception to the general rule against deferral of mitigation measures where the performance criteria for each mitigation measure is identified and described in the EIR. (*Sacramento Old City Ass'n v. City Council* (1991) 229 Cal.App.3d 1011.)

12, cont.

Impermissible deferral can occur when an EIR calls for mitigation measures to be created based on future studies or describes mitigation measures in general terms but the agency fails to commit itself to specific performance standards. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281 [city improperly deferred mitigation to butterfly habitat by failing to provide standards or guidelines for its management]; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 671 [EIR failed to provide and commit to specific criteria or standard of performance for mitigating impacts to biological habitats]; see also *Cleveland National Forest Found. v San Diego Association of Governments* (2017) 17 Cal.App.5th 413, 442 [generalized air quality measures in the EIR failed to set performance standards]; *California Clean Energy Comm. v City of Woodland* (2014) 225 Cal.App.4th 173, 195 [agency could not rely on a future report on urban decay with no standards for determining whether mitigation required]; *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 740 [agency could not rely on future rulemaking to establish specifications to ensure emissions of nitrogen oxide would not increase because it did not establish objective performance criteria for measuring whether that goal would be achieved]; *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1119 [rejecting mitigation measure requiring replacement water to be provided to neighboring landowners because it identified a general goal for mitigation rather than specific performance standard]; *Endangered Habitats League, Inc. v. County of Orange* (2005) 131Cal.App.4th 777, 794 [requiring report without established standards is impermissible delay].)

It is notable that there are already widely accepted professional standards for the qualifications and performance standards for mitigation of impacts to paleontological resources, In order to avoid deferred development of GS-1, the 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources by the Society for Vertebrate Paleontology ("2010 Standard Procedures").[17]

[17] https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf

GS-1 should be modified to require that the paleontologist retained meet the requirements for a "qualified professional paleontologist" and that any paleontological monitors conducting full-time monitoring during the Project's grading and excavation operations must meet the requirements for a "paleontological resource monitor" pursuant to the 2010 Standard Procedures.

12, cont.

The plan for paleontological mitigation should at minimum be required to meet the 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources by the Society for Vertebrate Paleontology; hereby attached as Exhibit D.

Finally, it is important to note that there are well developed professional protocols that could easily be integrated into the other mitigation measures, besides GS-1 to provide enforceable performance standards. In particular, as to CR-1, the State of California's Governor's Office of Planning and Research as well as the United States Department of the Interior have specific guidelines for consultation with, evaluation, and treatment of tribal remains and other archaeological resources. [18] The DEIR should be modified to require that mitigation and monitoring efforts comply with the aforementioned national and state guidelines.

IV. THE DEIR FAILS TO DEMONSTRATE CONSISTENCY WITH SCAG'S RTP/SCS

A. Background Information on SCAG's RTP/SCS

13

Senate Bill No. 375 requires regional planning agencies to include a sustainable communities strategy in their regional transportation plans. Gov. Code § 65080, sub.(b)(2)(B).) CEQA Guidelines § 15125(d) provides that an EIR "shall discuss any inconsistencies between the proposed project and…regional plans. Such regional plans include…regional transportation plans." Thus, CEQA requires analysis of any inconsistencies between the Project and the relevant RTP/SCS plan.

[18] Governor's Office of Planning and Research (2017) Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA, *available at* https://opr.ca.gov/docs/20200224-AB_52_Technical_Advisory_Feb_2020.pdf; U.S. Department of the Interior, National Park Service (2000) Guidelines for Evaluating and Registering Archeological Properties, *available at* https://www.nps.gov/subjects/nationalregister/upload/NRB36-Complete.pdf; U.S. Department of the Interior, National Park Service (1992) Guidelines for Evaluating and Documenting Traditional Cultural Properties, *available at* https://www.nps.gov/subjects/nationalregister/upload/NRB38-Completeweb.pdf.

In April 2012, SCAG adopted its 2012-2035 RTP/ SCS ("2012 RTP/SCS"), which proposed specific land use policies and transportation strategies for local governments to implement that will help the region achieve GHG emission reductions of 9 percent per capita in 2020 and 16 percent per capita in 2035.

13, cont. In April 2016, SCAG adopted the 2016-2040 RTP/SCS ("2016 RTP/SCS")[19], which incorporates and builds upon the policies and strategies in the 2012 RTP/SCS[20], that will help the region achieve GHG emission reductions that would reduce the region's per capita transportation emissions by eight percent by 2020 and 18 percent by 2035.[21] SCAG's RTP/SCS plan is based upon the same requirements outlined in CARB's 2017 Scoping Plan and SB 375.

On September 3, 2020, SCAG adopted the 2020 – 2045 RTP / SCS titled Connect SoCal ("2020 RTP/ SCS").[22] The 2020 RTP / SCS adopts policies and strategies aimed at reducing the region's per capita greenhouse gas emissions by 8% below 2005 per capita emissions levels by 2020 and 19% below 2005 per capita emissions levels by 2035.

B. <u>The DEIR Fails to Demonstrate Consistency with SCAG's SoCal Connect.</u>

14 CEQA Guidelines section 15125(d) requires that an environmental impact report "discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans." *See also Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal. App. 5th 467, 543. Further, "[a]n EIR must provide the reader with an analytic bridge between the evidence and findings." (*Topanga Assn for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.)

For example, the DEIR states that "[w]ith its mix of land uses, the Project is consistent with and supports the Sustainable Communities Strategy that encourages a diverse mix of land uses in urban environments." (DEIR, Appendix G, p. 3)

---

[20] SCAG (Apr. 2016) 2016 RTP/SCS, p. 69, 75-115 (attached as Exhibit D).
[21] *Id.*, p. 8, 15, 153, 166.
[22] SCAG (Sept 2020) Connect Socal: The 2020 – 2045 Regional Transportation Plan / Sustainable Communities Strategy of the Southern California Association of Governments, *available at* https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

14, cont.

The DEIR fails to provide a consistency analysis or a discussion. The DEIR must provide the reader with an analytic bridge between the evidence and findings. (*Topanga Assn for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.) This conclusory statement provides an insufficient analysis of compliance with SCAG's Connect SoCal regional RTP/SCS plan which includes specific project mitigation strategies that apply to the Project.

For both the 2012 and 2016 RTP/SCS, SCAG prepared Program Environmental Impact Reports ("PEIR") that include Mitigation Monitoring and Reporting Programs ("MMRP") that list project-level environmental mitigation measures that directly and/or indirectly relate to a project's GHG impacts and contribution to the region's GHG emissions.[23] These environmental mitigation measures serve to help local municipalities when identifying mitigation to reduce impacts on a project-specific basis that can and should be implemented when they identify and mitigate project-specific environmental impacts.[24]

15

C. The DEIR Incorrectly Relies Upon Plan Level Goals Outlined in the RTP/SCS

Here the DEIR claims the Project RTP/SCS consistency made through the analysis of general goals or policies of that plan. (However, the goals that the DEIR analyzes for Project consistency are not applicable at the project level, only at a plan level to inform implementation of the RTP/SCS Plan. Thus, the DEIR incorrectly relies upon plan level goals outlined in the RTP/SCS. In the 2016 RTP/SCS Plan, SCAG states that:

> The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. Ultimately, the Plan is intended to help guide transportation and land use decisions and public investments…This Plan's goals are intended to help carry out our vision for improved mobility, a strong economy and sustainability."[25]

[23] *Id.*, p. 116-124; see also SCAG (April 2012) Regional Transportation Plan 2012 – 20135, fn. 38, p. 77-86 (attached as Exhibit E).
[24] SCAG 2012 RTP/SCS (attached as Exhibit E), p. 77; see also SCAG 2016 RTP/SCS, fn. 41, p. 115.
[25] SCAG 2016-2040 RTP/SCS Plan, pp. 63, 65 (emphasis added)

15, cont.

The DEIR fails to demonstrate that it is consistent with many of the RTP/SCS Plan's *project-level* goals, including:

Land Use and Transportation

- Providing transit fare discounts[26];
- Implementing transit integration strategies[27]; and
- Anticipating shared mobility platforms, car-to-car communications, and automated vehicle technologies.[28]

GHG Emissions Goals[29]

- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines,[30] such as:
  - o Potential measures to reduce wasteful, inefficient and unnecessary consumption of energy during construction, operation, maintenance and/or removal. The discussion should explain why certain measures were incorporated in the project and why other measures were dismissed.
  - o The potential siting, orientation, and design to minimize energy consumption, including transportation energy.
  - o The potential for reducing peak energy demand.
  - o Alternate fuels (particularly renewable ones) or energy systems.
  - o Energy conservation which could result from recycling efforts.

[26] SCAG 2016 RTP/SCS, pp. 75-114
[27] *Id.*
[28] *Id.*
[29] SCAG 2012 RTP/SCS (Mar. 2012) Final PEIR MMRP, p. 6-2—6-14 (including mitigation measures ("MM") AQ3, BIO/OS3, CUL2, GEO3, GHG15, HM3, LU14, NO1, POP4, PS12, TR23, W9 [stating "[l]ocal agencies can and should comply with the requirements of CEQA to mitigate impacts to [the environmental] as applicable and feasible …[and] may refer to Appendix G of this PEIR for examples of potential mitigation to consider when appropriate in reducing environmental impacts of future projects." (Emphasis added)]),; see also id., Final PEIR Appendix G (including MMs AQ1-23, GHG1-8, PS1-104, TR1-83, W1-62),; SCAG 2016 RTP/SCS (Mar. 2016) Final PEIR MMRP, p. 11–63 (including MMs AIR-2(b), AIR-4(b), EN- 2(b), GHG-3(b), HYD-1(b), HYD-2(b), HYD-8(b), TRA-1(b), TRA-2(b), USS-4(b), USS-6(b)).
[30] CEQA Guidelines, Appendix F-Energy Conservation, http://resources.ca.gov/ceqa/guidelines/Appendix_F.html.

15, cont.

- Off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
  - o Use energy and fuel-efficient vehicles and equipment;
  - o Deployment of zero- and/or near zero emission technologies;
  - o Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
  - o Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
  - o Incorporate design measures to reduce energy consumption and increase use of renewable energy;
  - o Incorporate design measures to reduce water consumption;
  - o Use lighter-colored pavement where feasible;
  - o Recycle construction debris to maximum extent feasible;
- Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs.
- Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;
- Land use siting and design measures that reduce GHG emissions, including:
  - o Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
  - o Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

15, cont.

Hydrology & Water Quality Goals

- Incorporate measures consistent in a manner that conforms to the standards set by regulatory agencies responsible for regulating water quality/supply requirements, such as:
  - o Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings(xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.
  - o Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible.
  - o Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair.
  - o Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code.
  - o Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.
  - o Avoid designs that require continual dewatering where feasible.
  - o Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.

- Incorporate measures consistent in a manner that conforms to the standards set by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements, such as:
  - o Complete, and have approved, a Stormwater Pollution Prevention Plan ("SWPPP") before initiation of construction.
  - o Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable.
  - o Comply with the Caltrans stormwater discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control.
  - o Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures.
  - o Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.
  - o Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse (e.g., Army Corps § 404 permit, Regional Waterboard § 401 permit, Fish & Wildlife § 401 permit).
  - o Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.
  - o Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban stormwater runoff discharge permits, on new facilities.
  - o Provide structural stormwater runoff treatment consistent with the applicable urban stormwater runoff permit where Caltrans is the operator, the statewide permit applies.
  - o Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water

15, cont.

quality degradation in compliance with applicable stormwater runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase.

15, cont.

- o Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' stormwater discharge permit including long-term sediment control and drainage of roadway runoff.
- o Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process.
- o Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, volumes must not be exceeded. This applies not only to increases in stormwater runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of

any downstream receiving waters.

- o Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel.
- o Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels.

o Encourage Low Impact Development ("LID") and incorporation of natural

spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.

- Incorporate measures consistent with the provisions of the Groundwater Management Act and implementing regulations, such as:

  o For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code.

  o Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation.

  o Avoid designs that require continual dewatering where feasible.

  o Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface.

  o Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.

- Incorporate mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, such as:

  o Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program.

  o Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of

15, cont.

alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.

Transportation, Traffic, and Safety

15, cont.

- Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation.
- Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides.
- Provide a vanpool for employees.
- Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including:
  - o Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement.
  - o Direct transit sales or subsidized transit passes.
  - o Guaranteed ride home program.
  - o Pre-tax commuter benefits (checks).
  - o On-site car-sharing program (such as City Car Share, Zip Car, etc.).
  - o On-site carpooling program.
  - o Distribution of information concerning alternative transportation options.
  - o Parking spaces sold/leased separately.
  - o Parking management strategies; including attendant/valet parking and shared parking spaces.
- Promote ride sharing programs e.g., by designating a certain percentage of

15, cont.

parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.

- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services.
- Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs.
- Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles.
- Purchase, or create incentives for purchasing, low or zero-emission vehicles.
- Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles.
- Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including:
  - o Designate a certain percentage of parking spaces for ride-sharing vehicles.
  - o Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles.
  - o Provide a web site or message board for coordinating shared rides.
  - o Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit.
  - o Hire or designate a rideshare coordinator to develop and implement ridesharing programs.
- Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including:

15, cont.

- o Provide assistance to regional and local ridesharing organizations.
- o Advocate for legislation to maintain and expand incentives for employer ridesharing programs.
- o Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes.
- o Provide public recognition of effective programs through awards, top ten lists, and other mechanisms.

- Implement a "guaranteed ride home" program for those who commute by public transit, ridesharing, or other modes of transportation, and encourage employers to subscribe to or support the program.
- Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations.
- Create a free or low-cost local area shuttle system that includes a fixed route to popular tourist destinations or shopping and business centers.
- Work with existing shuttle service providers to coordinate their services.
- Facilitate employment opportunities that minimize the need for private vehicle trips, such as encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate.
- Organize events and workshops to promote GHG-reducing activities.
- Implement a Parking Management Program to discourage private vehicle use, including:
  - o Encouraging carpools and vanpools with preferential parking and a reduced parking fee.
  - o Institute a parking cash-out program or establish a parking fee for all single-occupant vehicles.

<u>Utilities & Service Systems</u>

- Integrate green building measures consistent with CALGreen (Title 24, part 11), U.S. Green Building Council's Leadership in Energy and Environmental Design, energy Star Homes, Green Point Rated Homes,

15, cont.

and the California Green Builder Program into project design including, but not limited to the following:

- o Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.
- o Inclusion of a waste management plan that promotes maximum C&D diversion.
- o Development of indoor recycling program and space.
- o Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required.
- o Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities.
- o Develop alternative waste management strategies such as composting, recycling, and conversion technologies.
- o Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts.
- o Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard).
- o Integrate reuse and recycling into residential industrial, institutional and commercial projects.
- o Provide recycling opportunities for residents, the public, and tenant businesses.
- o Provide education and publicity about reducing waste and available

recycling services.

- o Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.

15, cont.

The DEIR fail to mention or demonstrate consistency with the above listed measures and strategies of the SCAG RTP/SCS Plan. The DEIR should be revised to indicate what *specific project-level* mitigation measures that will be followed to demonstrate consistency with the RTP/SCS Plan.

V. CONCLUSION

16

The Southwest Carpenters request that the City revise and recirculate the Project's environmental impact report to address the aforementioned concerns. If the City has any questions or concerns, feel free to contact my Office.

Sincerely,

Mitchell M. Tsai
Attorneys for the Southwest
Regional Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B);

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C);

2010 Standard Procedures by the Society for Vertebrate Paleontology (Exhibit D); and

Los Angeles County Metropolitan Transportation Authority, Maps and Schedules, accessed November 29, 2021 (Exhibit E).

EXHIBIT A

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise ("SWAPE") is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas ("GHG") emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model ("CalEEMod") is a "statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects."[1] CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.[2]

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[3]

[1] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[2] "California Emissions Estimator Model." CAPCOA, 2017, *available at:* http://www.aqmd.gov/caleemod/home.
[3] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled ("VMT") associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.[4]

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

> "$VMT_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$
>
> Where:
>
> n = Number of land uses being modeled."[5]

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

> "$\text{Emissions}_{pollutant} = VMT * EF_{running,pollutant}$
>
> Where:
>
> $\text{Emissions}_{pollutant}$ = emissions from vehicle running for each pollutant
>
> VMT = vehicle miles traveled
>
> $EF_{running,pollutant}$ = emission factor for running emissions."[6]

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.[7] In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act ("CEQA") requires that such changes be justified by substantial evidence.[8] The default number of construction-related worker trips is calculated by multiplying the

[4] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.
[5] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.
[6] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[7] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[8] CalEEMod User Guide, *available at:* http://www.caleemod.com/, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.[9] Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively."[10] Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.[11] The operational home-to-work vehicle trip lengths are:

> "[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings" (emphasis added). [12]

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).[13]

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Minimum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

[9] "CalEEMod User's Guide." CAPCOA, November 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.
[10] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.
[11] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.
[12] "Appendix A Calculation Details for CalEEMod." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.
[13] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8-miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7-miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan ("Project") located in the City of Claremont ("City"). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.[14] In an effort to evaluate the potential for a local hire provision to reduce the Project's construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO_2e)	3,623
Amortized Construction GHG Emissions (MT CO_2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized Construction GHG Emissions (MT CO_2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project's urbanization level and location.

[14] "Appendix D Default Data Tables." CAPCOA, October 2017, *available at:* http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

Matt Hagemann, P.G., C.Hg.

Paul E. Rosenfeld, Ph.D.

Location Type	Location Name	Rural H-W (miles)	Urban H-W (miles)
Air Basin	Great Basin	16.8	10.8
Air Basin	Lake County	16.8	10.8
Air Basin	Lake Tahoe	16.8	10.8
Air Basin	Mojave Desert	16.8	10.8
Air Basin	Mountain	16.8	10.8
Air Basin	North Central	17.1	12.3
Air Basin	North Coast	16.8	10.8
Air Basin	Northeast	16.8	10.8
Air Basin	Sacramento	16.8	10.8
Air Basin	Salton Sea	14.6	11
Air Basin	San Diego	16.8	10.8
Air Basin	San Francisco	10.8	10.8
Air Basin	San Joaquin	16.8	10.8
Air Basin	South Central	16.8	10.8
Air Basin	South Coast	19.8	14.7
Air District	Amador County	16.8	10.8
Air District	Antelope Valley	16.8	10.8
Air District	Bay Area AQMD	10.8	10.8
Air District	Butte County	12.54	12.54
Air District	Calaveras	16.8	10.8
Air District	Colusa County	16.8	10.8
Air District	El Dorado	16.8	10.8
Air District	Feather River	16.8	10.8
Air District	Glenn County	16.8	10.8
Air District	Great Basin	16.8	10.8
Air District	Imperial County	10.2	7.3
Air District	Kern County	16.8	10.8
Air District	Lake County	16.8	10.8
Air District	Lassen County	16.8	10.8
Air District	Mariposa	16.8	10.8
Air District	Mendocino	16.8	10.8
Air District	Modoc County	16.8	10.8
Air District	Mojave Desert	16.8	10.8
Air District	Monterey Bay	16.8	10.8
Air District	North Coast	16.8	10.8
Air District	Northern Sierra	16.8	10.8
Air District	Northern	16.8	10.8
Air District	Placer County	16.8	10.8
Air District	Sacramento	15	10

Air District	San Diego	16.8	10.8
Air District	San Joaquin	16.8	10.8
Air District	San Luis Obispo	13	13
Air District	Santa Barbara	8.3	8.3
Air District	Shasta County	16.8	10.8
Air District	Siskiyou County	16.8	10.8
Air District	South Coast	19.8	14.7
Air District	Tehama County	16.8	10.8
Air District	Tuolumne	16.8	10.8
Air District	Ventura County	16.8	10.8
Air District	Yolo/Solano	15	10
County	Alameda	10.8	10.8
County	Alpine	16.8	10.8
County	Amador	16.8	10.8
County	Butte	12.54	12.54
County	Calaveras	16.8	10.8
County	Colusa	16.8	10.8
County	Contra Costa	10.8	10.8
County	Del Norte	16.8	10.8
County	El Dorado-Lake	16.8	10.8
County	El Dorado-	16.8	10.8
County	Fresno	16.8	10.8
County	Glenn	16.8	10.8
County	Humboldt	16.8	10.8
County	Imperial	10.2	7.3
County	Inyo	16.8	10.8
County	Kern-Mojave	16.8	10.8
County	Kern-San	16.8	10.8
County	Kings	16.8	10.8
County	Lake	16.8	10.8
County	Lassen	16.8	10.8
County	Los Angeles-	16.8	10.8
County	Los Angeles-	19.8	14.7
County	Madera	16.8	10.8
County	Marin	10.8	10.8
County	Mariposa	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Mendocino-	16.8	10.8
County	Merced	16.8	10.8
County	Modoc	16.8	10.8
County	Mono	16.8	10.8
County	Monterey	16.8	10.8
County	Napa	10.8	10.8

County	Nevada	16.8	10.8
County	Orange	19.8	14.7
County	Placer-Lake	16.8	10.8
County	Placer-Mountain	16.8	10.8
County	Placer-	16.8	10.8
County	Plumas	16.8	10.8
County	Riverside-	16.8	10.8
County	Riverside-	19.8	14.7
County	Riverside-Salton	14.6	11
County	Riverside-South	19.8	14.7
County	Sacramento	15	10
County	San Benito	16.8	10.8
County	San Bernardino-	16.8	10.8
County	San Bernardino-	19.8	14.7
County	San Diego	16.8	10.8
County	San Francisco	10.8	10.8
County	San Joaquin	16.8	10.8
County	San Luis Obispo	13	13
County	San Mateo	10.8	10.8
County	Santa Barbara-	8.3	8.3
County	Santa Barbara-	8.3	8.3
County	Santa Clara	10.8	10.8
County	Santa Cruz	16.8	10.8
County	Shasta	16.8	10.8
County	Sierra	16.8	10.8
County	Siskiyou	16.8	10.8
County	Solano-	15	10
County	Solano-San	16.8	10.8
County	Sonoma-North	16.8	10.8
County	Sonoma-San	10.8	10.8
County	Stanislaus	16.8	10.8
County	Sutter	16.8	10.8
County	Tehama	16.8	10.8
County	Trinity	16.8	10.8
County	Tulare	16.8	10.8
County	Tuolumne	16.8	10.8
County	Ventura	16.8	10.8
County	Yolo	15	10
County	Yuba	16.8	10.8
Statewide	Statewide	16.8	10.8

Worker Trip Length by Air Basin		
Air Basin	**Rural (miles)**	**Urban (miles)**
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	**16.47**	**11.17**
Mininum	**10.80**	**10.80**
Maximum	**19.80**	**14.70**
Range	**9.00**	**3.90**

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1969	213.1969	0.0601	0.0000	214.6993
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6826	1,721.6826	0.1294	0.0000	1,724.9187
2023	0.6148	3.3649	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5295	1,627.5295	0.1185	0.0000	1,630.4925
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9078	52.9078	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6826**	**1,721.6826**	**0.1294**	**0.0000**	**1,724.9187**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1713	1.8242	1.1662	2.4000e-003	0.4169	0.0817	0.4986	0.1795	0.0754	0.2549	0.0000	213.1967	213.1967	0.0601	0.0000	214.6991
2022	0.6904	4.1142	6.1625	0.0189	1.3058	0.1201	1.4259	0.3460	0.1128	0.4588	0.0000	1,721.6823	1,721.6823	0.1294	0.0000	1,724.9183
2023	0.6148	3.3648	5.6747	0.0178	1.1963	0.0996	1.2959	0.3203	0.0935	0.4138	0.0000	1,627.5291	1,627.5291	0.1185	0.0000	1,630.4921
2024	4.1619	0.1335	0.2810	5.9000e-004	0.0325	6.4700e-003	0.0390	8.6300e-003	6.0400e-003	0.0147	0.0000	52.9077	52.9077	8.0200e-003	0.0000	53.1082
Maximum	**4.1619**	**4.1142**	**6.1625**	**0.0189**	**1.3058**	**0.1201**	**1.4259**	**0.3460**	**0.1128**	**0.4588**	**0.0000**	**1,721.6823**	**1,721.6823**	**0.1294**	**0.0000**	**1,724.9183**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4103	1.4103
2	**12-1-2021**	**2-28-2022**	1.3613	1.3613
3	**3-1-2022**	**5-31-2022**	1.1985	1.1985
4	**6-1-2022**	**8-31-2022**	1.1921	1.1921
5	**9-1-2022**	**11-30-2022**	1.1918	1.1918
6	**12-1-2022**	**2-28-2023**	1.0774	1.0774
7	**3-1-2023**	**5-31-2023**	1.0320	1.0320
8	**6-1-2023**	**8-31-2023**	1.0260	1.0260

9	**9-1-2023**	**11-30-2023**	1.0265	1.0265
10	**12-1-2023**	**2-29-2024**	2.8857	2.8857
11	**3-1-2024**	**5-31-2024**	1.6207	1.6207
		Highest	2.8857	2.8857

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	9.7000e-004	7.5000e-004	8.5100e-003	2.0000e-005	2.4700e-003	2.0000e-005	2.4900e-003	6.5000e-004	2.0000e-005	6.7000e-004	0.0000	2.2251	2.2251	7.0000e-005	0.0000	2.2267
Total	**2.9000e-003**	**0.0641**	**0.0233**	**2.0000e-004**	**6.4100e-003**	**2.1000e-004**	**6.6200e-003**	**1.7300e-003**	**2.0000e-004**	**1.9300e-003**	**0.0000**	**19.6816**	**19.6816**	**1.2800e-003**	**0.0000**	**19.7136**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.7000e-004	6.0000e-004	6.8100e-003	2.0000e-005	1.9700e-003	2.0000e-005	1.9900e-003	5.2000e-004	1.0000e-005	5.4000e-004	0.0000	1.7801	1.7801	5.0000e-005	0.0000	1.7814
Total	**7.7000e-004**	**6.0000e-004**	**6.8100e-003**	**2.0000e-005**	**1.9700e-003**	**2.0000e-005**	**1.9900e-003**	**5.2000e-004**	**1.0000e-005**	**5.4000e-004**	**0.0000**	**1.7801**	**1.7801**	**5.0000e-005**	**0.0000**	**1.7814**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6400e-003	1.2700e-003	0.0144	4.0000e-005	4.1600e-003	3.0000e-005	4.2000e-003	1.1100e-003	3.0000e-005	1.1400e-003	0.0000	3.7579	3.7579	1.1000e-004	0.0000	3.7607
Total	**1.6400e-003**	**1.2700e-003**	**0.0144**	**4.0000e-005**	**4.1600e-003**	**3.0000e-005**	**4.2000e-003**	**1.1100e-003**	**3.0000e-005**	**1.1400e-003**	**0.0000**	**3.7579**	**3.7579**	**1.1000e-004**	**0.0000**	**3.7607**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	2.1000e-004	2.4400e-003	1.0000e-005	7.7000e-004	1.0000e-005	7.7000e-004	2.0000e-004	1.0000e-005	2.1000e-004	0.0000	0.6679	0.6679	2.0000e-005	0.0000	0.6684
Total	**2.8000e-004**	**2.1000e-004**	**2.4400e-003**	**1.0000e-005**	**7.7000e-004**	**1.0000e-005**	**7.7000e-004**	**2.0000e-004**	**1.0000e-005**	**2.1000e-004**	**0.0000**	**0.6679**	**0.6679**	**2.0000e-005**	**0.0000**	**0.6684**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.4088	0.3066	3.5305	0.0107	1.1103	8.8700e-003	1.1192	0.2949	8.1700e-003	0.3031	0.0000	966.8117	966.8117	0.0266	0.0000	967.4773
Total	**0.4616**	**2.0027**	**3.9885**	**0.0152**	**1.2243**	**0.0121**	**1.2363**	**0.3278**	**0.0112**	**0.3390**	**0.0000**	**1,408.7952**	**1,408.7952**	**0.0530**	**0.0000**	**1,410.1208**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.3753	0.2708	3.1696	0.0101	1.0840	8.4100e-003	1.0924	0.2879	7.7400e-003	0.2957	0.0000	909.3439	909.3439	0.0234	0.0000	909.9291
Total	**0.4135**	**1.5218**	**3.5707**	**0.0144**	**1.1953**	**9.8700e-003**	**1.2051**	**0.3200**	**9.1400e-003**	**0.3292**	**0.0000**	**1,327.3369**	**1,327.3369**	**0.0462**	**0.0000**	**1,328.4916**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.7000e-004	2.7000e-004	3.1200e-003	1.0000e-005	1.0700e-003	1.0000e-005	1.0800e-003	2.8000e-004	1.0000e-005	2.9000e-004	0.0000	0.8963	0.8963	2.0000e-005	0.0000	0.8968
Total	**3.7000e-004**	**2.7000e-004**	**3.1200e-003**	**1.0000e-005**	**1.0700e-003**	**1.0000e-005**	**1.0800e-003**	**2.8000e-004**	**1.0000e-005**	**2.9000e-004**	**0.0000**	**0.8963**	**0.8963**	**2.0000e-005**	**0.0000**	**0.8968**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.9000e-004	4.1000e-004	4.9200e-003	2.0000e-005	1.8100e-003	1.0000e-005	1.8200e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.4697	1.4697	4.0000e-005	0.0000	1.4706
Total	**5.9000e-004**	**4.1000e-004**	**4.9200e-003**	**2.0000e-005**	**1.8100e-003**	**1.0000e-005**	**1.8200e-003**	**4.8000e-004**	**1.0000e-005**	**4.9000e-004**	**0.0000**	**1.4697**	**1.4697**	**4.0000e-005**	**0.0000**	**1.4706**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0101	6.9900e-003	0.0835	2.8000e-004	0.0307	2.3000e-004	0.0309	8.1500e-003	2.2000e-004	8.3700e-003	0.0000	24.9407	24.9407	6.1000e-004	0.0000	24.9558
Total	**0.0101**	**6.9900e-003**	**0.0835**	**2.8000e-004**	**0.0307**	**2.3000e-004**	**0.0309**	**8.1500e-003**	**2.2000e-004**	**8.3700e-003**	**0.0000**	**24.9407**	**24.9407**	**6.1000e-004**	**0.0000**	**24.9558**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1521
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2769	46.4588	31.6840	0.0643	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,234.7974	6,234.7974	1.9495	0.0000	6,283.5352
2022	5.3304	38.8967	49.5629	0.1517	9.8688	1.6366	10.7727	3.6558	1.5057	5.1615	0.0000	15,251.5674	15,251.5674	1.9503	0.0000	15,278.5288
2023	4.8957	26.3317	46.7567	0.1472	9.8688	0.7794	10.6482	2.6381	0.7322	3.3702	0.0000	14,807.5269	14,807.5269	1.0250	0.0000	14,833.1520
2024	237.1630	9.5575	15.1043	0.0244	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,361.3989	2,361.3989	0.7177	0.0000	2,379.3421
Maximum	**237.1630**	**46.4588**	**49.5629**	**0.1517**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**15,251.5674**	**15,251.5674**	**1.9503**	**0.0000**	**15,278.5288**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0643	0.0442	0.6042	1.7100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		170.8155	170.8155	5.0300e-003		170.9413
Total	**0.1916**	**4.1394**	**1.5644**	**0.0136**	**0.4346**	**0.0139**	**0.4485**	**0.1176**	**0.0133**	**0.1309**		**1,463.0568**	**1,463.0568**	**0.0927**		**1,465.3750**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0772	0.0530	0.7250	2.0600e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		204.9786	204.9786	6.0400e-003		205.1296
Total	**0.0772**	**0.0530**	**0.7250**	**2.0600e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**204.9786**	**204.9786**	**6.0400e-003**		**205.1296**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0857	0.0589	0.8056	2.2900e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		227.7540	227.7540	6.7100e-003		227.9217
Total	**0.0857**	**0.0589**	**0.8056**	**2.2900e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**227.7540**	**227.7540**	**6.7100e-003**		**227.9217**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0803	0.0532	0.7432	2.2100e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		219.7425	219.7425	6.0600e-003		219.8941
Total	**0.0803**	**0.0532**	**0.7432**	**2.2100e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**219.7425**	**219.7425**	**6.0600e-003**		**219.8941**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	3.2162	2.1318	29.7654	0.0883	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,800.6857	8,800.6857	0.2429		8,806.7582
Total	**3.6242**	**15.3350**	**33.1995**	**0.1247**	**9.8688**	**0.0949**	**9.9637**	**2.6381**	**0.0883**	**2.7263**		**12,697.2339**	**12,697.2339**	**0.4665**		**12,708.8966**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	3.0203	1.9287	27.4113	0.0851	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		8,478.4408	8,478.4408	0.2190		8,483.9160
Total	**3.3229**	**11.9468**	**30.5127**	**0.1203**	**9.8688**	**0.0797**	**9.9485**	**2.6381**	**0.0738**	**2.7118**		**12,252.3170**	**12,252.3170**	**0.4172**		**12,262.7460**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0566	0.0361	0.5133	1.5900e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		158.7723	158.7723	4.1000e-003		158.8748
Total	**0.0566**	**0.0361**	**0.5133**	**1.5900e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**158.7723**	**158.7723**	**4.1000e-003**		**158.8748**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0535	0.0329	0.4785	1.5400e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		153.8517	153.8517	3.7600e-003		153.9458
Total	**0.0535**	**0.0329**	**0.4785**	**1.5400e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**153.8517**	**153.8517**	**3.7600e-003**		**153.9458**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.5707	0.3513	5.1044	0.0165	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,641.0852	1,641.0852	0.0401		1,642.0886
Total	**0.5707**	**0.3513**	**5.1044**	**0.0165**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,641.0852**	**1,641.0852**	**0.0401**		**1,642.0886**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82
tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27

tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2865	46.4651	31.6150	0.0642	18.2675	2.0461	20.3135	9.9840	1.8824	11.8664	0.0000	6,221.4937	6,221.4937	1.9491	0.0000	6,270.2214
2022	5.7218	38.9024	47.3319	0.1455	9.8688	1.6366	10.7736	3.6558	1.5057	5.1615	0.0000	14,630.3099	14,630.3099	1.9499	0.0000	14,657.2663
2023	5.2705	26.4914	44.5936	0.1413	9.8688	0.7800	10.6488	2.6381	0.7328	3.3708	0.0000	14,210.3424	14,210.3424	1.0230	0.0000	14,235.9160
2024	237.2328	9.5610	15.0611	0.0243	1.7884	0.4698	1.8628	0.4743	0.4322	0.5476	0.0000	2,352.4178	2,352.4178	0.7175	0.0000	2,370.3550
Maximum	**237.2328**	**46.4651**	**47.3319**	**0.1455**	**18.2675**	**2.0461**	**20.3135**	**9.9840**	**1.8824**	**11.8664**	**0.0000**	**14,630.3099**	**14,630.3099**	**1.9499**	**0.0000**	**14,657.2663**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0489	0.5524	1.6100e-003	0.1677	1.3500e-003	0.1690	0.0445	1.2500e-003	0.0457		160.8377	160.8377	4.7300e-003		160.9560
Total	**0.2019**	**4.1943**	**1.5706**	**0.0133**	**0.4346**	**0.0141**	**0.4487**	**0.1176**	**0.0135**	**0.1311**		**1,430.6932**	**1,430.6932**	**0.0955**		**1,433.0812**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0858	0.0587	0.6629	1.9400e-003	0.2012	1.6300e-003	0.2028	0.0534	1.5000e-003	0.0549		193.0052	193.0052	5.6800e-003		193.1472
Total	**0.0858**	**0.0587**	**0.6629**	**1.9400e-003**	**0.2012**	**1.6300e-003**	**0.2028**	**0.0534**	**1.5000e-003**	**0.0549**		**193.0052**	**193.0052**	**5.6800e-003**		**193.1472**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0954	0.0652	0.7365	2.1500e-003	0.2236	1.8100e-003	0.2254	0.0593	1.6600e-003	0.0610		214.4502	214.4502	6.3100e-003		214.6080
Total	**0.0954**	**0.0652**	**0.7365**	**2.1500e-003**	**0.2236**	**1.8100e-003**	**0.2254**	**0.0593**	**1.6600e-003**	**0.0610**		**214.4502**	**214.4502**	**6.3100e-003**		**214.6080**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0896	0.0589	0.6784	2.0800e-003	0.2236	1.7500e-003	0.2253	0.0593	1.6100e-003	0.0609		206.9139	206.9139	5.7000e-003		207.0563
Total	**0.0896**	**0.0589**	**0.6784**	**2.0800e-003**	**0.2236**	**1.7500e-003**	**0.2253**	**0.0593**	**1.6100e-003**	**0.0609**		**206.9139**	**206.9139**	**5.7000e-003**		**207.0563**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	3.5872	2.3593	27.1680	0.0832	8.9533	0.0701	9.0234	2.3745	0.0646	2.4390		8,286.9013	8,286.9013	0.2282		8,292.6058
Total	**4.0156**	**15.5266**	**30.9685**	**0.1186**	**9.8688**	**0.0957**	**9.9645**	**2.6381**	**0.0891**	**2.7271**		**12,075.9763**	**12,075.9763**	**0.4663**		**12,087.6341**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	3.3795	2.1338	24.9725	0.0801	8.9533	0.0681	9.0214	2.3745	0.0627	2.4372		7,983.7318	7,983.7318	0.2055		7,988.8683
Total	**3.6978**	**12.1065**	**28.3496**	**0.1144**	**9.8688**	**0.0803**	**9.9491**	**2.6381**	**0.0743**	**2.7124**		**11,655.1325**	**11,655.1325**	**0.4151**		**11,665.5099**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0633	0.0400	0.4677	1.5000e-003	0.1677	1.2800e-003	0.1689	0.0445	1.1700e-003	0.0456		149.5081	149.5081	3.8500e-003		149.6043
Total	**0.0633**	**0.0400**	**0.4677**	**1.5000e-003**	**0.1677**	**1.2800e-003**	**0.1689**	**0.0445**	**1.1700e-003**	**0.0456**		**149.5081**	**149.5081**	**3.8500e-003**		**149.6043**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0601	0.0364	0.4354	1.4500e-003	0.1677	1.2600e-003	0.1689	0.0445	1.1600e-003	0.0456		144.8706	144.8706	3.5300e-003		144.9587
Total	**0.0601**	**0.0364**	**0.4354**	**1.4500e-003**	**0.1677**	**1.2600e-003**	**0.1689**	**0.0445**	**1.1600e-003**	**0.0456**		**144.8706**	**144.8706**	**3.5300e-003**		**144.9587**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.6406	0.3886	4.6439	0.0155	1.7884	0.0134	1.8018	0.4743	0.0123	0.4866		1,545.2860	1,545.2860	0.0376		1,546.2262
Total	**0.6406**	**0.3886**	**4.6439**	**0.0155**	**1.7884**	**0.0134**	**1.8018**	**0.4743**	**0.0123**	**0.4866**		**1,545.2860**	**1,545.2860**	**0.0376**		**1,546.2262**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7654	210.7654	0.0600	0.0000	212.2661
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6554	1,418.6554	0.1215	0.0000	1,421.6925
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4412	1,342.4412	0.1115	0.0000	1,345.2291
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6355	44.6355	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6554**	**1,418.6554**	**0.1215**	**0.0000**	**1,421.6925**

2.1 Overall Construction

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.1704	1.8234	1.1577	2.3800e-003	0.4141	0.0817	0.4958	0.1788	0.0754	0.2542	0.0000	210.7651	210.7651	0.0600	0.0000	212.2658
2022	0.5865	4.0240	5.1546	0.0155	0.9509	0.1175	1.0683	0.2518	0.1103	0.3621	0.0000	1,418.6550	1,418.6550	0.1215	0.0000	1,421.6921
2023	0.5190	3.2850	4.7678	0.0147	0.8497	0.0971	0.9468	0.2283	0.0912	0.3195	0.0000	1,342.4409	1,342.4409	0.1115	0.0000	1,345.2287
2024	4.1592	0.1313	0.2557	5.0000e-004	0.0221	6.3900e-003	0.0285	5.8700e-003	5.9700e-003	0.0118	0.0000	44.6354	44.6354	7.8300e-003	0.0000	44.8311
Maximum	**4.1592**	**4.0240**	**5.1546**	**0.0155**	**0.9509**	**0.1175**	**1.0683**	**0.2518**	**0.1103**	**0.3621**	**0.0000**	**1,418.6550**	**1,418.6550**	**0.1215**	**0.0000**	**1,421.6921**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	**9-1-2021**	**11-30-2021**	1.4091	1.4091
2	**12-1-2021**	**2-28-2022**	1.3329	1.3329
3	**3-1-2022**	**5-31-2022**	1.1499	1.1499
4	**6-1-2022**	**8-31-2022**	1.1457	1.1457
5	**9-1-2022**	**11-30-2022**	1.1415	1.1415
6	**12-1-2022**	**2-28-2023**	1.0278	1.0278
7	**3-1-2023**	**5-31-2023**	0.9868	0.9868
8	**6-1-2023**	**8-31-2023**	0.9831	0.9831

9	**9-1-2023**	**11-30-2023**	0.9798	0.9798
10	**12-1-2023**	**2-29-2024**	2.8757	2.8757
11	**3-1-2024**	**5-31-2024**	1.6188	1.6188
		Highest	2.8757	2.8757

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Energy	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	3,896.0732	3,896.0732	0.1303	0.0468	3,913.2833
Mobile	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Waste						0.0000	0.0000		0.0000	0.0000	207.8079	0.0000	207.8079	12.2811	0.0000	514.8354
Water						0.0000	0.0000		0.0000	0.0000	29.1632	556.6420	585.8052	3.0183	0.0755	683.7567
Total	**6.8692**	**9.5223**	**30.3407**	**0.0914**	**7.7979**	**0.2260**	**8.0240**	**2.0895**	**0.2219**	**2.3114**	**236.9712**	**12,294.1807**	**12,531.1519**	**15.7904**	**0.1260**	**12,963.4751**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0012	51.0012	0.0144	0.0000	51.3601
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0012**	**51.0012**	**0.0144**	**0.0000**	**51.3601**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0496	0.0000	0.0496	7.5100e-003	0.0000	7.5100e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0475	0.4716	0.3235	5.8000e-004		0.0233	0.0233		0.0216	0.0216	0.0000	51.0011	51.0011	0.0144	0.0000	51.3600
Total	**0.0475**	**0.4716**	**0.3235**	**5.8000e-004**	**0.0496**	**0.0233**	**0.0729**	**7.5100e-003**	**0.0216**	**0.0291**	**0.0000**	**51.0011**	**51.0011**	**0.0144**	**0.0000**	**51.3600**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.9300e-003	0.0634	0.0148	1.8000e-004	3.9400e-003	1.9000e-004	4.1300e-003	1.0800e-003	1.8000e-004	1.2600e-003	0.0000	17.4566	17.4566	1.2100e-003	0.0000	17.4869
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.2000e-004	5.3000e-004	6.0900e-003	2.0000e-005	1.6800e-003	1.0000e-005	1.6900e-003	4.5000e-004	1.0000e-005	4.6000e-004	0.0000	1.5281	1.5281	5.0000e-005	0.0000	1.5293
Total	**2.6500e-003**	**0.0639**	**0.0209**	**2.0000e-004**	**5.6200e-003**	**2.0000e-004**	**5.8200e-003**	**1.5300e-003**	**1.9000e-004**	**1.7200e-003**	**0.0000**	**18.9847**	**18.9847**	**1.2600e-003**	**0.0000**	**19.0161**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7061
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7061**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1807	0.0000	0.1807	0.0993	0.0000	0.0993	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0389	0.4050	0.2115	3.8000e-004		0.0204	0.0204		0.0188	0.0188	0.0000	33.4357	33.4357	0.0108	0.0000	33.7060
Total	**0.0389**	**0.4050**	**0.2115**	**3.8000e-004**	**0.1807**	**0.0204**	**0.2011**	**0.0993**	**0.0188**	**0.1181**	**0.0000**	**33.4357**	**33.4357**	**0.0108**	**0.0000**	**33.7060**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.3000e-004	4.8700e-003	1.0000e-005	1.3400e-003	1.0000e-005	1.3500e-003	3.6000e-004	1.0000e-005	3.7000e-004	0.0000	1.2225	1.2225	4.0000e-005	0.0000	1.2234
Total	**5.8000e-004**	**4.3000e-004**	**4.8700e-003**	**1.0000e-005**	**1.3400e-003**	**1.0000e-005**	**1.3500e-003**	**3.6000e-004**	**1.0000e-005**	**3.7000e-004**	**0.0000**	**1.2225**	**1.2225**	**4.0000e-005**	**0.0000**	**1.2234**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5405	103.5405	0.0335	0.0000	104.3776
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5405**	**103.5405**	**0.0335**	**0.0000**	**104.3776**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.1741	0.0000	0.1741	0.0693	0.0000	0.0693	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0796	0.8816	0.5867	1.1800e-003		0.0377	0.0377		0.0347	0.0347	0.0000	103.5403	103.5403	0.0335	0.0000	104.3775
Total	**0.0796**	**0.8816**	**0.5867**	**1.1800e-003**	**0.1741**	**0.0377**	**0.2118**	**0.0693**	**0.0347**	**0.1040**	**0.0000**	**103.5403**	**103.5403**	**0.0335**	**0.0000**	**104.3775**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.2200e-003	9.0000e-004	0.0103	3.0000e-005	2.8300e-003	2.0000e-005	2.8600e-003	7.5000e-004	2.0000e-005	7.8000e-004	0.0000	2.5808	2.5808	8.0000e-005	0.0000	2.5828
Total	**1.2200e-003**	**9.0000e-004**	**0.0103**	**3.0000e-005**	**2.8300e-003**	**2.0000e-005**	**2.8600e-003**	**7.5000e-004**	**2.0000e-005**	**7.8000e-004**	**0.0000**	**2.5808**	**2.5808**	**8.0000e-005**	**0.0000**	**2.5828**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0807	0.0000	0.0807	0.0180	0.0000	0.0180	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0127	0.1360	0.1017	2.2000e-004		5.7200e-003	5.7200e-003		5.2600e-003	5.2600e-003	0.0000	19.0871	19.0871	6.1700e-003	0.0000	19.2414
Total	**0.0127**	**0.1360**	**0.1017**	**2.2000e-004**	**0.0807**	**5.7200e-003**	**0.0865**	**0.0180**	**5.2600e-003**	**0.0233**	**0.0000**	**19.0871**	**19.0871**	**6.1700e-003**	**0.0000**	**19.2414**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	1.5000e-004	1.7400e-003	1.0000e-005	5.2000e-004	0.0000	5.3000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4587	0.4587	1.0000e-005	0.0000	0.4590
Total	**2.1000e-004**	**1.5000e-004**	**1.7400e-003**	**1.0000e-005**	**5.2000e-004**	**0.0000**	**5.3000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4587**	**0.4587**	**1.0000e-005**	**0.0000**	**0.4590**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1324	293.1324	0.0702	0.0000	294.8881
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1324**	**293.1324**	**0.0702**	**0.0000**	**294.8881**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2158	1.9754	2.0700	3.4100e-003		0.1023	0.1023		0.0963	0.0963	0.0000	293.1321	293.1321	0.0702	0.0000	294.8877
Total	**0.2158**	**1.9754**	**2.0700**	**3.4100e-003**		**0.1023**	**0.1023**		**0.0963**	**0.0963**	**0.0000**	**293.1321**	**293.1321**	**0.0702**	**0.0000**	**294.8877**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0527	1.6961	0.4580	4.5500e-003	0.1140	3.1800e-003	0.1171	0.0329	3.0400e-003	0.0359	0.0000	441.9835	441.9835	0.0264	0.0000	442.6435
Worker	0.3051	0.2164	2.5233	7.3500e-003	0.7557	6.2300e-003	0.7619	0.2007	5.7400e-003	0.2065	0.0000	663.9936	663.9936	0.0187	0.0000	664.4604
Total	**0.3578**	**1.9125**	**2.9812**	**0.0119**	**0.8696**	**9.4100e-003**	**0.8790**	**0.2336**	**8.7800e-003**	**0.2424**	**0.0000**	**1,105.9771**	**1,105.9771**	**0.0451**	**0.0000**	**1,107.1039**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2789	286.2789	0.0681	0.0000	287.9814
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2789**	**286.2789**	**0.0681**	**0.0000**	**287.9814**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1942	1.7765	2.0061	3.3300e-003		0.0864	0.0864		0.0813	0.0813	0.0000	286.2785	286.2785	0.0681	0.0000	287.9811
Total	**0.1942**	**1.7765**	**2.0061**	**3.3300e-003**		**0.0864**	**0.0864**		**0.0813**	**0.0813**	**0.0000**	**286.2785**	**286.2785**	**0.0681**	**0.0000**	**287.9811**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0382	1.2511	0.4011	4.3000e-003	0.1113	1.4600e-003	0.1127	0.0321	1.4000e-003	0.0335	0.0000	417.9930	417.9930	0.0228	0.0000	418.5624
Worker	0.2795	0.1910	2.2635	6.9100e-003	0.7377	5.9100e-003	0.7436	0.1960	5.4500e-003	0.2014	0.0000	624.5363	624.5363	0.0164	0.0000	624.9466
Total	**0.3177**	**1.4420**	**2.6646**	**0.0112**	**0.8490**	**7.3700e-003**	**0.8564**	**0.2281**	**6.8500e-003**	**0.2349**	**0.0000**	**1,042.5294**	**1,042.5294**	**0.0392**	**0.0000**	**1,043.5090**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	6.7100e-003	0.0663	0.0948	1.5000e-004		3.3200e-003	3.3200e-003		3.0500e-003	3.0500e-003	0.0000	13.0175	13.0175	4.2100e-003	0.0000	13.1227
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**6.7100e-003**	**0.0663**	**0.0948**	**1.5000e-004**		**3.3200e-003**	**3.3200e-003**		**3.0500e-003**	**3.0500e-003**	**0.0000**	**13.0175**	**13.0175**	**4.2100e-003**	**0.0000**	**13.1227**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.8000e-004	1.9000e-004	2.2300e-003	1.0000e-005	7.3000e-004	1.0000e-005	7.3000e-004	1.9000e-004	1.0000e-005	2.0000e-004	0.0000	0.6156	0.6156	2.0000e-005	0.0000	0.6160
Total	**2.8000e-004**	**1.9000e-004**	**2.2300e-003**	**1.0000e-005**	**7.3000e-004**	**1.0000e-005**	**7.3000e-004**	**1.9000e-004**	**1.0000e-005**	**2.0000e-004**	**0.0000**	**0.6156**	**0.6156**	**2.0000e-005**	**0.0000**	**0.6160**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0109	0.1048	0.1609	2.5000e-004		5.1500e-003	5.1500e-003		4.7400e-003	4.7400e-003	0.0000	22.0292	22.0292	7.1200e-003	0.0000	22.2073
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0109**	**0.1048**	**0.1609**	**2.5000e-004**		**5.1500e-003**	**5.1500e-003**		**4.7400e-003**	**4.7400e-003**	**0.0000**	**22.0292**	**22.0292**	**7.1200e-003**	**0.0000**	**22.2073**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.4000e-004	2.9000e-004	3.5100e-003	1.0000e-005	1.2300e-003	1.0000e-005	1.2400e-003	3.3000e-004	1.0000e-005	3.4000e-004	0.0000	1.0094	1.0094	3.0000e-005	0.0000	1.0100
Total	**4.4000e-004**	**2.9000e-004**	**3.5100e-003**	**1.0000e-005**	**1.2300e-003**	**1.0000e-005**	**1.2400e-003**	**3.3000e-004**	**1.0000e-005**	**3.4000e-004**	**0.0000**	**1.0094**	**1.0094**	**3.0000e-005**	**0.0000**	**1.0100**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	4.1372					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.1600e-003	0.0213	0.0317	5.0000e-005		1.0700e-003	1.0700e-003		1.0700e-003	1.0700e-003	0.0000	4.4682	4.4682	2.5000e-004	0.0000	4.4745
Total	**4.1404**	**0.0213**	**0.0317**	**5.0000e-005**		**1.0700e-003**	**1.0700e-003**		**1.0700e-003**	**1.0700e-003**	**0.0000**	**4.4682**	**4.4682**	**2.5000e-004**	**0.0000**	**4.4745**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4800e-003	4.9300e-003	0.0596	1.9000e-004	0.0209	1.6000e-004	0.0211	5.5500e-003	1.5000e-004	5.7000e-003	0.0000	17.1287	17.1287	4.3000e-004	0.0000	17.1394
Total	**7.4800e-003**	**4.9300e-003**	**0.0596**	**1.9000e-004**	**0.0209**	**1.6000e-004**	**0.0211**	**5.5500e-003**	**1.5000e-004**	**5.7000e-003**	**0.0000**	**17.1287**	**17.1287**	**4.3000e-004**	**0.0000**	**17.1394**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162
Unmitigated	1.5857	7.9962	19.1834	0.0821	7.7979	0.0580	7.8559	2.0895	0.0539	2.1434	0.0000	7,620.4986	7,620.4986	0.3407	0.0000	7,629.0162

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	2,512.6465	2,512.6465	0.1037	0.0215	2,521.6356
NaturalGas Mitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478
NaturalGas Unmitigated	0.1398	1.2312	0.7770	7.6200e-003		0.0966	0.0966		0.0966	0.0966	0.0000	1,383.4267	1,383.4267	0.0265	0.0254	1,391.6478

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Apartments Low Rise	408494	2.2000e-003	0.0188	8.0100e-003	1.2000e-004		1.5200e-003	1.5200e-003		1.5200e-003	1.5200e-003	0.0000	21.7988	21.7988	4.2000e-004	4.0000e-004	21.9284
Apartments Mid Rise	1.30613e+007	0.0704	0.6018	0.2561	3.8400e-003		0.0487	0.0487		0.0487	0.0487	0.0000	696.9989	696.9989	0.0134	0.0128	701.1408
General Office Building	468450	2.5300e-003	0.0230	0.0193	1.4000e-004		1.7500e-003	1.7500e-003		1.7500e-003	1.7500e-003	0.0000	24.9983	24.9983	4.8000e-004	4.6000e-004	25.1468
High Turnover (Sit Down Restaurant)	8.30736e+006	0.0448	0.4072	0.3421	2.4400e-003		0.0310	0.0310		0.0310	0.0310	0.0000	443.3124	443.3124	8.5000e-003	8.1300e-003	445.9468
Hotel	1.74095e+006	9.3900e-003	0.0853	0.0717	5.1000e-004		6.4900e-003	6.4900e-003		6.4900e-003	6.4900e-003	0.0000	92.9036	92.9036	1.7800e-003	1.7000e-003	93.4557
Quality Restaurant	1.84608e+006	9.9500e-003	0.0905	0.0760	5.4000e-004		6.8800e-003	6.8800e-003		6.8800e-003	6.8800e-003	0.0000	98.5139	98.5139	1.8900e-003	1.8100e-003	99.0993
Regional Shopping Center	91840	5.0000e-004	4.5000e-003	3.7800e-003	3.0000e-005		3.4000e-004	3.4000e-004		3.4000e-004	3.4000e-004	0.0000	4.9009	4.9009	9.0000e-005	9.0000e-005	4.9301
Total		**0.1398**	**1.2312**	**0.7770**	**7.6200e-003**		**0.0966**	**0.0966**		**0.0966**	**0.0966**	**0.0000**	**1,383.4268**	**1,383.4268**	**0.0265**	**0.0254**	**1,391.6478**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Apartments Low Rise	106010	33.7770	1.3900e-003	2.9000e-004	33.8978
Apartments Mid Rise	3.94697e+006	1,257.5879	0.0519	0.0107	1,262.0869
General Office Building	584550	186.2502	7.6900e-003	1.5900e-003	186.9165
High Turnover (Sit Down Restaurant)	1.58904e+006	506.3022	0.0209	4.3200e-003	508.1135
Hotel	550308	175.3399	7.2400e-003	1.5000e-003	175.9672
Quality Restaurant	353120	112.5116	4.6500e-003	9.6000e-004	112.9141
Regional Shopping Center	756000	240.8778	9.9400e-003	2.0600e-003	241.7395
Total		**2,512.6465**	**0.1037**	**0.0215**	**2,521.6356**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835
Unmitigated	5.1437	0.2950	10.3804	1.6700e-003		0.0714	0.0714		0.0714	0.0714	0.0000	220.9670	220.9670	0.0201	3.7400e-003	222.5835

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.4137					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	4.3998					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0206	0.1763	0.0750	1.1200e-003		0.0143	0.0143		0.0143	0.0143	0.0000	204.1166	204.1166	3.9100e-003	3.7400e-003	205.3295
Landscaping	0.3096	0.1187	10.3054	5.4000e-004		0.0572	0.0572		0.0572	0.0572	0.0000	16.8504	16.8504	0.0161	0.0000	17.2540
Total	**5.1437**	**0.2950**	**10.3804**	**1.6600e-003**		**0.0714**	**0.0714**		**0.0714**	**0.0714**	**0.0000**	**220.9670**	**220.9670**	**0.0201**	**3.7400e-003**	**222.5835**

7.0 Water Detail

7.1 Mitigation Measures Water

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	585.8052	3.0183	0.0755	683.7567
Unmitigated	585.8052	3.0183	0.0755	683.7567

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Apartments Low Rise	1.62885 / 1.02688	10.9095	0.0535	1.3400e-003	12.6471
Apartments Mid Rise	63.5252 / 40.0485	425.4719	2.0867	0.0523	493.2363
General Office Building	7.99802 / 4.90201	53.0719	0.2627	6.5900e-003	61.6019
High Turnover (Sit Down Restaurant)	10.9272 / 0.697482	51.2702	0.3580	8.8200e-003	62.8482
Hotel	1.26834 / 0.140927	6.1633	0.0416	1.0300e-003	7.5079
Quality Restaurant	2.42827 / 0.154996	11.3934	0.0796	1.9600e-003	13.9663
Regional Shopping Center	4.14806 / 2.54236	27.5250	0.1363	3.4200e-003	31.9490
Total		**585.8052**	**3.0183**	**0.0755**	**683.7567**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	207.8079	12.2811	0.0000	514.8354
Unmitigated	207.8079	12.2811	0.0000	514.8354

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

8.2 Waste by Land Use

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Apartments Low Rise	11.5	2.3344	0.1380	0.0000	5.7834
Apartments Mid Rise	448.5	91.0415	5.3804	0.0000	225.5513
General Office Building	41.85	8.4952	0.5021	0.0000	21.0464
High Turnover (Sit Down Restaurant)	428.4	86.9613	5.1393	0.0000	215.4430
Hotel	27.38	5.5579	0.3285	0.0000	13.7694
Quality Restaurant	7.3	1.4818	0.0876	0.0000	3.6712
Regional Shopping Center	58.8	11.9359	0.7054	0.0000	29.5706
Total		**207.8079**	**12.2811**	**0.0000**	**514.8354**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0956
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2561	46.4415	31.4494	0.0636	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,163.4166	6,163.4166	1.9475	0.0000	6,212.1039
2022	4.5441	38.8811	40.8776	0.1240	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,493.4403	12,493.4403	1.9485	0.0000	12,518.5707
2023	4.1534	25.7658	38.7457	0.1206	7.0088	0.7592	7.7679	1.8799	0.7136	2.5935	0.0000	12,150.4890	12,150.4890	0.9589	0.0000	12,174.4615
2024	237.0219	9.5478	14.9642	0.0239	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,313.1808	2,313.1808	0.7166	0.0000	2,331.0955
Maximum	**237.0219**	**46.4415**	**40.8776**	**0.1240**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,493.4403**	**12,493.4403**	**1.9485**	**0.0000**	**12,518.5707**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Total	**41.1168**	**67.2262**	**207.5497**	**0.6278**	**45.9592**	**2.4626**	**48.4217**	**12.2950**	**2.4385**	**14.7336**	**0.0000**	**76,811.1816**	**76,811.1816**	**2.8282**	**0.4832**	**77,025.8786**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1273	4.0952	0.9602	0.0119	0.2669	0.0126	0.2795	0.0732	0.0120	0.0852		1,292.2413	1,292.2413	0.0877		1,294.4337
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0487	0.0313	0.4282	1.1800e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		117.2799	117.2799	3.5200e-003		117.3678
Total	**0.1760**	**4.1265**	**1.3884**	**0.0131**	**0.3810**	**0.0135**	**0.3946**	**0.1034**	**0.0129**	**0.1163**		**1,409.5212**	**1,409.5212**	**0.0912**		**1,411.8015**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0584	0.0375	0.5139	1.4100e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		140.7359	140.7359	4.2200e-003		140.8414
Total	**0.0584**	**0.0375**	**0.5139**	**1.4100e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**140.7359**	**140.7359**	**4.2200e-003**		**140.8414**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0649	0.0417	0.5710	1.5700e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		156.3732	156.3732	4.6900e-003		156.4904
Total	**0.0649**	**0.0417**	**0.5710**	**1.5700e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**156.3732**	**156.3732**	**4.6900e-003**		**156.4904**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0607	0.0376	0.5263	1.5100e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		150.8754	150.8754	4.2400e-003		150.9813
Total	**0.0607**	**0.0376**	**0.5263**	**1.5100e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**150.8754**	**150.8754**	**4.2400e-003**		**150.9813**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4079	13.2032	3.4341	0.0364	0.9155	0.0248	0.9404	0.2636	0.0237	0.2873		3,896.5482	3,896.5482	0.2236		3,902.1384
Worker	2.4299	1.5074	21.0801	0.0607	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		6,042.5585	6,042.5585	0.1697		6,046.8000
Total	**2.8378**	**14.7106**	**24.5142**	**0.0971**	**7.0087**	**0.0741**	**7.0828**	**1.8799**	**0.0691**	**1.9490**		**9,939.1067**	**9,939.1067**	**0.3933**		**9,948.9384**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3027	10.0181	3.1014	0.0352	0.9156	0.0116	0.9271	0.2636	0.0111	0.2747		3,773.8762	3,773.8762	0.1982		3,778.8300
Worker	2.2780	1.3628	19.4002	0.0584	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,821.4028	5,821.4028	0.1529		5,825.2254
Total	**2.5807**	**11.3809**	**22.5017**	**0.0936**	**7.0088**	**0.0595**	**7.0682**	**1.8799**	**0.0552**	**1.9350**		**9,595.2790**	**9,595.2790**	**0.3511**		**9,604.0554**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0427	0.0255	0.3633	1.0900e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		109.0150	109.0150	2.8600e-003		109.0866
Total	**0.0427**	**0.0255**	**0.3633**	**1.0900e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**109.0150**	**109.0150**	**2.8600e-003**		**109.0866**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0403	0.0233	0.3384	1.0600e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		105.6336	105.6336	2.6300e-003		105.6992
Total	**0.0403**	**0.0233**	**0.3384**	**1.0600e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**105.6336**	**105.6336**	**2.6300e-003**		**105.6992**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4296	0.2481	3.6098	0.0113	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,126.7583	1,126.7583	0.0280		1,127.4583
Total	**0.4296**	**0.2481**	**3.6098**	**0.0113**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,126.7583**	**1,126.7583**	**0.0280**		**1,127.4583**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208
Unmitigated	9.8489	45.4304	114.8495	0.4917	45.9592	0.3360	46.2951	12.2950	0.3119	12.6070		50,306.6034	50,306.6034	2.1807		50,361.1208

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Village South Specific Plan (Proposed)

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	45.00	1000sqft	1.03	45,000.00	0
High Turnover (Sit Down Restaurant)	36.00	1000sqft	0.83	36,000.00	0
Hotel	50.00	Room	1.67	72,600.00	0
Quality Restaurant	8.00	1000sqft	0.18	8,000.00	0
Apartments Low Rise	25.00	Dwelling Unit	1.56	25,000.00	72
Apartments Mid Rise	975.00	Dwelling Unit	25.66	975,000.00	2789
Regional Shopping Center	56.00	1000sqft	1.29	56,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	33
Climate Zone	9			**Operational Year**	2028
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Project Characteristics - Consistent with the DEIR's model.

Land Use - See SWAPE comment regarding residential and retail land uses.

Construction Phase - See SWAPE comment regarding individual construction phase lengths.

Demolition - Consistent with the DEIR's model. See SWAPE comment regarding demolition.

Vehicle Trips - Saturday trips consistent with the DEIR's model. See SWAPE comment regarding weekday and Sunday trips.

Woodstoves - Woodstoves and wood-burning fireplaces consistent with the DEIR's model. See SWAPE comment regarding gas fireplaces.

Energy Use -

Construction Off-road Equipment Mitigation - See SWAPE comment on construction-related mitigation.

Area Mitigation - See SWAPE comment regarding operational mitigation measures.

Water Mitigation - See SWAPE comment regarding operational mitigation measures.

Trips and VMT - Local hire provision

Table Name	Column Name	Default Value	New Value
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	FireplaceWoodMass	1,019.20	0.00
tblFireplaces	NumberWood	1.25	0.00
tblFireplaces	NumberWood	48.75	0.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblTripsAndVMT	WorkerTripLength	14.70	10.00
tblVehicleTrips	ST_TR	7.16	6.17
tblVehicleTrips	ST_TR	6.39	3.87
tblVehicleTrips	ST_TR	2.46	1.39
tblVehicleTrips	ST_TR	158.37	79.82

tblVehicleTrips	ST_TR	8.19	3.75
tblVehicleTrips	ST_TR	94.36	63.99
tblVehicleTrips	ST_TR	49.97	10.74
tblVehicleTrips	SU_TR	6.07	6.16
tblVehicleTrips	SU_TR	5.86	4.18
tblVehicleTrips	SU_TR	1.05	0.69
tblVehicleTrips	SU_TR	131.84	78.27
tblVehicleTrips	SU_TR	5.95	3.20
tblVehicleTrips	SU_TR	72.16	57.65
tblVehicleTrips	SU_TR	25.24	6.39
tblVehicleTrips	WD_TR	6.59	5.83
tblVehicleTrips	WD_TR	6.65	4.13
tblVehicleTrips	WD_TR	11.03	6.41
tblVehicleTrips	WD_TR	127.15	65.80
tblVehicleTrips	WD_TR	8.17	3.84
tblVehicleTrips	WD_TR	89.95	62.64
tblVehicleTrips	WD_TR	42.70	9.43
tblWoodstoves	NumberCatalytic	1.25	0.00
tblWoodstoves	NumberCatalytic	48.75	0.00
tblWoodstoves	NumberNoncatalytic	1.25	0.00
tblWoodstoves	NumberNoncatalytic	48.75	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveDayYear	25.00	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00
tblWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

2.1 Overall Construction (Maximum Daily Emission)

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	4.2621	46.4460	31.4068	0.0635	18.2032	2.0456	20.2488	9.9670	1.8820	11.8490	0.0000	6,154.3377	6,154.3377	1.9472	0.0000	6,203.0186
2022	4.7966	38.8851	39.6338	0.1195	8.8255	1.6361	10.4616	3.6369	1.5052	5.1421	0.0000	12,035.3440	12,035.3440	1.9482	0.0000	12,060.6013
2023	4.3939	25.8648	37.5031	0.1162	7.0088	0.7598	7.7685	1.8799	0.7142	2.5940	0.0000	11,710.4080	11,710.4080	0.9617	0.0000	11,734.4497
2024	237.0656	9.5503	14.9372	0.0238	1.2171	0.4694	1.2875	0.3229	0.4319	0.4621	0.0000	2,307.0517	2,307.0517	0.7164	0.0000	2,324.9627
Maximum	**237.0656**	**46.4460**	**39.6338**	**0.1195**	**18.2032**	**2.0456**	**20.2488**	**9.9670**	**1.8820**	**11.8490**	**0.0000**	**12,035.3440**	**12,035.3440**	**1.9482**	**0.0000**	**12,060.6013**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Energy	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
Mobile	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Total	**40.7912**	**67.7872**	**202.7424**	**0.6043**	**45.9592**	**2.4640**	**48.4231**	**12.2950**	**2.4399**	**14.7349**	**0.0000**	**74,422.3787**	**74,422.3787**	**2.8429**	**0.4832**	**74,637.4417**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	9/1/2021	10/12/2021	5	30	
2	Site Preparation	Site Preparation	10/13/2021	11/9/2021	5	20	
3	Grading	Grading	11/10/2021	1/11/2022	5	45	
4	Building Construction	Building Construction	1/12/2022	12/12/2023	5	500	
5	Paving	Paving	12/13/2023	1/30/2024	5	35	
6	Architectural Coating	Architectural Coating	1/31/2024	3/19/2024	5	35	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 112.5

Acres of Paving: 0

Residential Indoor: 2,025,000; Residential Outdoor: 675,000; Non-Residential Indoor: 326,400; Non-Residential Outdoor: 108,800; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	2	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Scrapers	2	8.00	367	0.48
Grading	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	6	15.00	0.00	458.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	18.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	8	20.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	801.00	143.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	160.00	0.00	0.00	10.00	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411		3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**		**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.3074	0.0000	3.3074	0.5008	0.0000	0.5008			0.0000			0.0000
Off-Road	3.1651	31.4407	21.5650	0.0388		1.5513	1.5513		1.4411	1.4411	0.0000	3,747.9449	3,747.9449	1.0549		3,774.3174
Total	**3.1651**	**31.4407**	**21.5650**	**0.0388**	**3.3074**	**1.5513**	**4.8588**	**0.5008**	**1.4411**	**1.9419**	**0.0000**	**3,747.9449**	**3,747.9449**	**1.0549**		**3,774.3174**

3.2 Demolition - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1304	4.1454	1.0182	0.0117	0.2669	0.0128	0.2797	0.0732	0.0122	0.0854		1,269.8555	1,269.8555	0.0908		1,272.1252
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0532	0.0346	0.3963	1.1100e-003	0.1141	9.5000e-004	0.1151	0.0303	8.8000e-004	0.0311		110.4707	110.4707	3.3300e-003		110.5539
Total	**0.1835**	**4.1800**	**1.4144**	**0.0128**	**0.3810**	**0.0137**	**0.3948**	**0.1034**	**0.0131**	**0.1165**		**1,380.3262**	**1,380.3262**	**0.0941**		**1,382.6791**

3.3 Site Preparation - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809		3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**		**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					18.0663	0.0000	18.0663	9.9307	0.0000	9.9307			0.0000			0.0000
Off-Road	3.8882	40.4971	21.1543	0.0380		2.0445	2.0445		1.8809	1.8809	0.0000	3,685.6569	3,685.6569	1.1920		3,715.4573
Total	**3.8882**	**40.4971**	**21.1543**	**0.0380**	**18.0663**	**2.0445**	**20.1107**	**9.9307**	**1.8809**	**11.8116**	**0.0000**	**3,685.6569**	**3,685.6569**	**1.1920**		**3,715.4573**

3.3 Site Preparation - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0638	0.0415	0.4755	1.3300e-003	0.1369	1.1400e-003	0.1381	0.0363	1.0500e-003	0.0374		132.5649	132.5649	3.9900e-003		132.6646
Total	**0.0638**	**0.0415**	**0.4755**	**1.3300e-003**	**0.1369**	**1.1400e-003**	**0.1381**	**0.0363**	**1.0500e-003**	**0.0374**		**132.5649**	**132.5649**	**3.9900e-003**		**132.6646**

3.4 Grading - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265		6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**		**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	4.1912	46.3998	30.8785	0.0620		1.9853	1.9853		1.8265	1.8265	0.0000	6,007.0434	6,007.0434	1.9428		6,055.6134
Total	**4.1912**	**46.3998**	**30.8785**	**0.0620**	**8.6733**	**1.9853**	**10.6587**	**3.5965**	**1.8265**	**5.4230**	**0.0000**	**6,007.0434**	**6,007.0434**	**1.9428**		**6,055.6134**

3.4 Grading - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0709	0.0462	0.5284	1.4800e-003	0.1521	1.2700e-003	0.1534	0.0404	1.1700e-003	0.0415		147.2943	147.2943	4.4300e-003		147.4051
Total	**0.0709**	**0.0462**	**0.5284**	**1.4800e-003**	**0.1521**	**1.2700e-003**	**0.1534**	**0.0404**	**1.1700e-003**	**0.0415**		**147.2943**	**147.2943**	**4.4300e-003**		**147.4051**

3.4 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041		6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**		**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.6733	0.0000	8.6733	3.5965	0.0000	3.5965			0.0000			0.0000
Off-Road	3.6248	38.8435	29.0415	0.0621		1.6349	1.6349		1.5041	1.5041	0.0000	6,011.4105	6,011.4105	1.9442		6,060.0158
Total	**3.6248**	**38.8435**	**29.0415**	**0.0621**	**8.6733**	**1.6349**	**10.3082**	**3.5965**	**1.5041**	**5.1006**	**0.0000**	**6,011.4105**	**6,011.4105**	**1.9442**		**6,060.0158**

3.4 Grading - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0665	0.0416	0.4861	1.4300e-003	0.1521	1.2300e-003	0.1534	0.0404	1.1300e-003	0.0415		142.1207	142.1207	4.0000e-003		142.2207
Total	**0.0665**	**0.0416**	**0.4861**	**1.4300e-003**	**0.1521**	**1.2300e-003**	**0.1534**	**0.0404**	**1.1300e-003**	**0.0415**		**142.1207**	**142.1207**	**4.0000e-003**		**142.2207**

3.5 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612		2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**		**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.7062	15.6156	16.3634	0.0269		0.8090	0.8090		0.7612	0.7612	0.0000	2,554.3336	2,554.3336	0.6120		2,569.6322
Total	**1.7062**	**15.6156**	**16.3634**	**0.0269**		**0.8090**	**0.8090**		**0.7612**	**0.7612**	**0.0000**	**2,554.3336**	**2,554.3336**	**0.6120**		**2,569.6322**

3.5 Building Construction - 2022

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.4284	13.1673	3.8005	0.0354	0.9155	0.0256	0.9412	0.2636	0.0245	0.2881		3,789.0750	3,789.0750	0.2381		3,795.0283
Worker	2.6620	1.6677	19.4699	0.0571	6.0932	0.0493	6.1425	1.6163	0.0454	1.6617		5,691.9354	5,691.9354	0.1602		5,695.9408
Total	**3.0904**	**14.8350**	**23.2704**	**0.0926**	**7.0087**	**0.0749**	**7.0836**	**1.8799**	**0.0699**	**1.9498**		**9,481.0104**	**9,481.0104**	**0.3984**		**9,490.9691**

3.5 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584		2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**		**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.5728	14.3849	16.2440	0.0269		0.6997	0.6997		0.6584	0.6584	0.0000	2,555.2099	2,555.2099	0.6079		2,570.4061
Total	**1.5728**	**14.3849**	**16.2440**	**0.0269**		**0.6997**	**0.6997**		**0.6584**	**0.6584**	**0.0000**	**2,555.2099**	**2,555.2099**	**0.6079**		**2,570.4061**

3.5 Building Construction - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.3183	9.9726	3.3771	0.0343	0.9156	0.0122	0.9277	0.2636	0.0116	0.2752		3,671.4007	3,671.4007	0.2096		3,676.6417
Worker	2.5029	1.5073	17.8820	0.0550	6.0932	0.0479	6.1411	1.6163	0.0441	1.6604		5,483.7974	5,483.7974	0.1442		5,487.4020
Total	**2.8211**	**11.4799**	**21.2591**	**0.0893**	**7.0088**	**0.0601**	**7.0688**	**1.8799**	**0.0557**	**1.9356**		**9,155.1981**	**9,155.1981**	**0.3538**		**9,164.0437**

3.6 Paving - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694		2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**		**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0327	10.1917	14.5842	0.0228		0.5102	0.5102		0.4694	0.4694	0.0000	2,207.5841	2,207.5841	0.7140		2,225.4336
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**1.0327**	**10.1917**	**14.5842**	**0.0228**		**0.5102**	**0.5102**		**0.4694**	**0.4694**	**0.0000**	**2,207.5841**	**2,207.5841**	**0.7140**		**2,225.4336**

3.6 Paving - 2023

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0469	0.0282	0.3349	1.0300e-003	0.1141	9.0000e-004	0.1150	0.0303	8.3000e-004	0.0311		102.6928	102.6928	2.7000e-003		102.7603
Total	**0.0469**	**0.0282**	**0.3349**	**1.0300e-003**	**0.1141**	**9.0000e-004**	**0.1150**	**0.0303**	**8.3000e-004**	**0.0311**		**102.6928**	**102.6928**	**2.7000e-003**		**102.7603**

3.6 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310		2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**		**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9882	9.5246	14.6258	0.0228		0.4685	0.4685		0.4310	0.4310	0.0000	2,207.5472	2,207.5472	0.7140		2,225.3963
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.9882**	**9.5246**	**14.6258**	**0.0228**		**0.4685**	**0.4685**		**0.4310**	**0.4310**	**0.0000**	**2,207.5472**	**2,207.5472**	**0.7140**		**2,225.3963**

3.6 Paving - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0444	0.0257	0.3114	1.0000e-003	0.1141	8.8000e-004	0.1150	0.0303	8.1000e-004	0.0311		99.5045	99.5045	2.4700e-003		99.5663
Total	**0.0444**	**0.0257**	**0.3114**	**1.0000e-003**	**0.1141**	**8.8000e-004**	**0.1150**	**0.0303**	**8.1000e-004**	**0.0311**		**99.5045**	**99.5045**	**2.4700e-003**		**99.5663**

3.7 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609		281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**		**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	236.4115					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.1808	1.2188	1.8101	2.9700e-003		0.0609	0.0609		0.0609	0.0609	0.0000	281.4481	281.4481	0.0159		281.8443
Total	**236.5923**	**1.2188**	**1.8101**	**2.9700e-003**		**0.0609**	**0.0609**		**0.0609**	**0.0609**	**0.0000**	**281.4481**	**281.4481**	**0.0159**		**281.8443**

3.7 Architectural Coating - 2024

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.4734	0.2743	3.3220	0.0107	1.2171	9.4300e-003	1.2266	0.3229	8.6800e-003	0.3315		1,061.3818	1,061.3818	0.0264		1,062.0410
Total	**0.4734**	**0.2743**	**3.3220**	**0.0107**	**1.2171**	**9.4300e-003**	**1.2266**	**0.3229**	**8.6800e-003**	**0.3315**		**1,061.3818**	**1,061.3818**	**0.0264**		**1,062.0410**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839
Unmitigated	9.5233	45.9914	110.0422	0.4681	45.9592	0.3373	46.2965	12.2950	0.3132	12.6083		47,917.8005	47,917.8005	2.1953		47,972.6839

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	145.75	154.25	154.00	506,227	506,227
Apartments Mid Rise	4,026.75	3,773.25	4075.50	13,660,065	13,660,065
General Office Building	288.45	62.55	31.05	706,812	706,812
High Turnover (Sit Down Restaurant)	2,368.80	2,873.52	2817.72	3,413,937	3,413,937
Hotel	192.00	187.50	160.00	445,703	445,703
Quality Restaurant	501.12	511.92	461.20	707,488	707,488
Regional Shopping Center	528.08	601.44	357.84	1,112,221	1,112,221
Total	8,050.95	8,164.43	8,057.31	20,552,452	20,552,452

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
Apartments Mid Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3
General Office Building	16.60	8.40	6.90	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	16.60	8.40	6.90	8.50	72.50	19.00	37	20	43
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4
Quality Restaurant	16.60	8.40	6.90	12.00	69.00	19.00	38	18	44
Regional Shopping Center	16.60	8.40	6.90	16.30	64.70	19.00	54	35	11

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Apartments Mid Rise	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
General Office Building	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
High Turnover (Sit Down Restaurant)	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Hotel	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Quality Restaurant	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821
Regional Shopping Center	0.543088	0.044216	0.209971	0.116369	0.014033	0.006332	0.021166	0.033577	0.002613	0.001817	0.005285	0.000712	0.000821

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

Village South Specific Plan (Proposed) - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387
NaturalGas Unmitigated	0.7660	6.7462	4.2573	0.0418		0.5292	0.5292		0.5292	0.5292		8,355.9832	8,355.9832	0.1602	0.1532	8,405.6387

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1119.16	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35784.3	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1283.42	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22759.9	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4769.72	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5057.75	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	251.616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	1.11916	0.0121	0.1031	0.0439	6.6000e-004		8.3400e-003	8.3400e-003		8.3400e-003	8.3400e-003		131.6662	131.6662	2.5200e-003	2.4100e-003	132.4486
Apartments Mid Rise	35.7843	0.3859	3.2978	1.4033	0.0211		0.2666	0.2666		0.2666	0.2666		4,209.9164	4,209.9164	0.0807	0.0772	4,234.9339
General Office Building	1.28342	0.0138	0.1258	0.1057	7.5000e-004		9.5600e-003	9.5600e-003		9.5600e-003	9.5600e-003		150.9911	150.9911	2.8900e-003	2.7700e-003	151.8884
High Turnover (Sit Down Restaurant)	22.7599	0.2455	2.2314	1.8743	0.0134		0.1696	0.1696		0.1696	0.1696		2,677.6342	2,677.6342	0.0513	0.0491	2,693.5460
Hotel	4.76972	0.0514	0.4676	0.3928	2.8100e-003		0.0355	0.0355		0.0355	0.0355		561.1436	561.1436	0.0108	0.0103	564.4782
Quality Restaurant	5.05775	0.0545	0.4959	0.4165	2.9800e-003		0.0377	0.0377		0.0377	0.0377		595.0298	595.0298	0.0114	0.0109	598.5658
Regional Shopping Center	0.251616	2.7100e-003	0.0247	0.0207	1.5000e-004		1.8700e-003	1.8700e-003		1.8700e-003	1.8700e-003		29.6019	29.6019	5.7000e-004	5.4000e-004	29.7778
Total		**0.7660**	**6.7463**	**4.2573**	**0.0418**		**0.5292**	**0.5292**		**0.5292**	**0.5292**		**8,355.9832**	**8,355.9832**	**0.1602**	**0.1532**	**8,405.6387**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192
Unmitigated	30.5020	15.0496	88.4430	0.0944		1.5974	1.5974		1.5974	1.5974	0.0000	18,148.5950	18,148.5950	0.4874	0.3300	18,259.1192

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	2.2670					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	24.1085					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	1.6500	14.1000	6.0000	0.0900		1.1400	1.1400		1.1400	1.1400	0.0000	18,000.0000	18,000.0000	0.3450	0.3300	18,106.9650
Landscaping	2.4766	0.9496	82.4430	4.3600e-003		0.4574	0.4574		0.4574	0.4574		148.5950	148.5950	0.1424		152.1542
Total	**30.5020**	**15.0496**	**88.4430**	**0.0944**		**1.5974**	**1.5974**		**1.5974**	**1.5974**	**0.0000**	**18,148.5950**	**18,148.5950**	**0.4874**	**0.3300**	**18,259.1192**

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,623
Amortized (MT CO2e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO2e)	3,024
Amortized (MT CO2e/year)	100.80
% Decrease in Construction-related GHG Emissions	***17%***

EXHIBIT B

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

SOIL WATER AIR PROTECTION ENTERPRISE
2656 29th Street, Suite 201
Santa Monica, California 90405
Attn: Paul Rosenfeld, Ph.D.
Mobil: (310) 795-2335
Office: (310) 452-5555
Fax: (310) 452-5550
Email: prosenfeld@swape.com

Paul Rosenfeld, Ph.D.

Chemical Fate and Transport & Air Dispersion Modeling

Principal Environmental Chemist

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H_2O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health.* 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P**., (2015) Modeling the Effect of Refinery Emission On Residential Property Value. Journal of Real Estate Research. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.,** Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermod and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

Rosenfeld, P.E. & Feng, L. (2011). *The Risks of Hazardous Waste.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries.* Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution,* 123 (17), 319-327.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K.., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities.* Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004.* New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49(9), 171-178.

Rosenfeld, P. E., Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office*, Publications Clearinghouse (MS–6), Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

Rosenfeld, P.E., and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality.* 29, 1662-1668.

Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld. (**1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society.* Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution.* Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluoroctanoic Acid (PFOA) and Perfluoroactane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P**. (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water.* Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. The *23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting.* Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.,** Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition.* Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference.* Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference.* Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference.* Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference.* Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants*.. Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conferenc*e. Lecture conducted from Indianapolis, Maryland.

Rosenfeld. P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation.* Lecture conducted from Anaheim California.

Rosenfeld. P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest.* Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell.* Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest.* Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. $41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: $10,000 grant awarded to San Diego State University.
Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. $100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. $20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: $10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: $15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. $500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs,* vs. United States Metals Refining Company et. al. *Defendant.*
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs,* vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS "Conti Perdido" *Defendant.*
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosciences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017

In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs,* vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al.,, et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No,: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action N0. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant.*
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs,* vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs,* vs. BP Products North America, Inc., *Defendant.*
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C

SWAPE Technical Consultation, Data Analysis and Litigation Support for the Environment

1640 5th St.., Suite 204 Santa
Santa Monica, California 90401
Tel: (949) 887-9013
Email: mhagemann@swape.com

Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.
B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist
California Certified Hydrogeologist
Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt's responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt's duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, Oxygenates in Water: Critical Information and Research Needs.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Coloradao.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal repesentatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F**. 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

EXHIBIT D

Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources

Society of Vertebrate Paleontology
Impact Mitigation Guidelines Revision Committee

Abstract
Fossils are nonrenewable paleontological resources that are subject to impacts from land development. Procedures are presented for evaluating the potential for impacts of a proposed action on paleontological resources and for mitigating those impacts. Impact mitigation includes pre-project survey and salvage, monitoring and screen washing during excavation to salvage fossils, conservation and inventory, and final reports and specimen curation. The objective of these procedures is to offer standard methods for assessing potential impacts to fossils and mitigating these impacts.

Introduction
Fossils are nonrenewable paleontological resources that are afforded protection by federal, state, and local environmental laws and regulations. The Paleontological Resources Preservation Act (PRPA) of 2009 calls for uniform policies and standards that apply to fossils on all federal public lands. All federal land management agencies are required to develop regulations that satisfy the stipulations of the PRPA. Section 6302 of the PRPA mandates that federal agencies "*shall manage and protect paleontological resources on Federal land using scientific principles and expertise.*" Thus, federal agencies need the help of the professional paleontological community in the formulation and implementation of these PRPA-mandated policies and regulations. The potential for destruction or degradation of paleontological resources on both public and private lands selected for development under the jurisdiction of various governmental planning agencies is recognized. The standard procedures below are intended to be applicable to both private and public lands under the jurisdiction of local, city, county, regional, state, and federal agencies. Protection of paleontological resources includes: (a) assessment of the potential for land to contain significant paleontological resources which could be directly or indirectly impacted, damaged, or destroyed by proposed development and (b) formulation and implementation of measures to mitigate these adverse impacts, including permanent preservation of the site and/or permanent preservation of salvaged fossils along with all contextual data in established institutions.

Assessment of the Paleontological Potential of Rock Units
Rock units are described as having (a) high, (b) undetermined, (c) low, or (d) no potential for containing significant paleontological resources.

High Potential
Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcaniclastic formations (e. g., ashes or tephras), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous

and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.). Paleontological potential consists of both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data. Rock units which contain potentially datable organic remains older than late Holocene, including deposits associated with animal nests or middens, and rock units which may contain new vertebrate deposits, traces, or trackways are also classified as having high potential.

Undetermined Potential
Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist (see "definitions" section in this document) to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.

Low Potential
Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.

No Potential
Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

Discussion
It is extremely important to distinguish between archaeological and paleontological resources (see "definitions" section in this document) when discussing the paleontological potential of rock units. The boundaries of an archaeological resource site define the areal/geographic extent of an archaeological resource, which is generally independent from the rock unit on which it sits. However, paleontological sites indicate that the containing rock unit or formation is fossiliferous. Therefore, the limits of the entire rock unit, both areal and stratigraphic, define the extent of paleontological potential.

It is also important to ascertain if the paleontological resources are uniformly distributed throughout a rock unit or if they are confined as localized concentrations to specific members or facies. Using this information, paleontologists can develop maps which suggest areas that are likely to contain paleontological resources. These maps (Paleontological Resource Potential Maps) form the basis for preliminary planning decisions on which areas require a detailed paleontological resource impact assessment by a qualified professional paleontologist and which areas do not. Lead agency evaluation of a proposed project relative to such paleontological resource potential maps should trigger a "request for

opinion" from a qualified professional paleontologist, state paleontological clearing house, or an accredited institution with an established paleontological repository housing paleontological resources from the region of interest.

The determination of the paleontological resource potential of an area proposed for development is first founded on a review of pertinent geological and paleontological literature, geological maps, and on records in fossil locality databases of paleontological specimens deposited in institutions (e. g., museums and universities). This preliminary review may clearly indicate that particular rock units have known high potential. If the paleontological resource potential of a rock unit cannot be delimited from the literature search and specimen records, a field survey by a qualified professional paleontologist will be necessary to determine the fossiliferous potential and the distribution or concentrations of fossils within the extent of the rock units present in a specific project area. The field survey may need to extend outside the defined project limits to areas where the relevant rock units are better exposed. If the rock units in an area are determined to have a high potential for containing paleontological resources, a program to mitigate impacts to fossil resources must be developed. In areas containing rock units with high potential, a preconstruction survey (intensive reconnaissance) may be necessary to locate surface concentrations of fossils which might require salvage in advance of excavations to avoid delays to construction schedules.

Measures to Mitigate Adverse Impacts from Development

Measures for adequate protection or salvage of significant paleontological resources are applied to areas determined to contain rock units that have either a high or undetermined potential for containing significant fossils. The Paleontological Resource Preservation Act of 2009 establishes a uniform code for decision-making on all federal lands. Specific mitigation measures generally need not be developed for areas of low paleontological potential. Developers (public and private) and contractors should be made aware, however, that if there is not an on-site monitor it will be necessary to contact a qualified professional paleontologist if fossils are unearthed in the course of excavation. This contingency should be planned for in advance. In order to save time and project delays, in the advance planning phases of a project the developer should contact a qualified professional paleontologist and arrange for the salvage of any unanticipated fossils. The paleontologist will then salvage the fossils and assess the necessity for further mitigation measures, if applicable. Decisions regarding the intensity of the paleontological resource impact mitigation program will be made by the project paleontologist on the basis of the significance of the paleontological resources, and their biostratigraphic, biochronologic, paleoecologic, taphonomic, and taxonomic attributes, not on the ability of a project proponent to fund the paleontological resource impact mitigation program.

In areas determined to have high or undetermined potential for significant paleontological resources, an adequate program for mitigating the impact of development must include:

1. an intensive field survey and surface salvage prior to earth moving, if applicable;

2. monitoring by a qualified paleontological resource monitor (see "definitions" section in this document) of excavations in previously undisturbed rock units;

3. salvage of unearthed fossil remains and/or traces (e. g., tracks, trails, burrows, etc.);

4. screen washing to recover small specimens, if applicable;

5. preparation of salvaged fossils to a point of being ready for curation (i. e., removal of enclosing matrix, stabilization and repair of specimens, and construction of reinforced support cradles where appropriate);

6. identification, cataloging, curation, and provision for repository storage of prepared fossil specimens; and

7. a final report of the finds and their significance.

All phases of mitigation must be supervised by a qualified professional paleontologist who maintains the necessary paleontological collecting permits and repository agreements. All field teams will be supervised by a paleontologist qualified to deal with the significant resources that might be encountered. The lead agency must assure compliance with the measures developed to mitigate impacts of excavation. To assure compliance at the start of the project, a statement that confirms the site's paleontological potential, confirms the repository agreement with an established public institution, and describes the program for impact mitigation, must be deposited with the lead agency and contractor(s) before any ground disturbance begins. In many cases, it will be necessary to conduct a salvage program prior to grading to prevent damage to known paleontological resources and to avoid delays to construction schedules. The impact mitigation program must include preparation, identification, cataloging, and curation of any salvaged specimens. All field notes, photographs, stratigraphic sections, and other data associated with the recovery of the specimens must be deposited with the institution receiving the specimens. Since it is not professionally acceptable to salvage specimens without preparation and curation of specimens and associated data, costs for this phase of the program must be included in the project budget. The mitigation program must be reviewed and accepted by the lead agency. If a mitigation program is initiated early during the course of project planning, construction delays due to paleontological salvage activities can be minimized or even completely avoided.

© 2010 The Society of Vertebrate Paleontology

Standard Procedures
These standard procedures for paleontological resource impact assessment and mitigation are designed to apply to areas containing rock units with high, low, and undetermined paleontological resource potential.

Assessment before Construction Starts
An adequate preconstruction paleontological resource impact assessment is the key to developing an adequate paleontological resource impact mitigation program. Only a professional paleontologist is qualified to prepare a paleontological resource impact assessment. An adequate assessment of potential impacts typically includes all the following elements:

1. Literature Search—A review of the pertinent paleontological, geological, geotechnical, and environmental literature provides an information baseline for evaluating the extent of previous paleontological work in an area. Such a review also provides a fundamental basis for formulating mitigation plans and for understanding the significance of paleontological resources. The preconstruction assessment should also include examination of geotechnical reports, borehole logs, and geologic cross sections to address whether project excavations will impact rock units with high potential.

2. Records Search—A review of institutional localities and specimen records provides a means for determining the extent of previous fieldwork and fossil recovery in, and adjacent to, an area of interest. This task can be accomplished either by sending a written request for information to the relevant institution(s) or visiting the institution to review the records directly. A simple, on-line search of an institution's records is often incomplete and inadequate for determining the number and extent of known fossil localities in an area.

3. Consultation with Others—The preconstruction assessment should include consultation with geologists and paleontologists knowledgeable about the paleontological resource potential of rock units present in the vicinity of the proposed project.

4. Field Survey—The assessment should include a field survey by a qualified professional paleontologist and approved staff, as needed, to determine the paleontological potential of each rock unit, to re-examine any known fossil localities on or near the project, to search for unknown fossil localities, and to delimit the specific boundaries of rock units within the project area.

5. Reports—A paleontological resource impact assessment report and a project-specific paleontological resource impact mitigation program should be prepared based upon data gathered during the assessment.

6. Agency Confirmation—Prior to ground disturbance, the lead agency should review the paleontological resource impact assessment and proposed mitigation program to determine the adequacy of the proposed program.

7. Repository Agreement—The project paleontologist should have a repository agreement arranged prior to the start of earth-moving for the project.

8. Pre-excavation meetings—The project paleontologist should hold pre-excavation meetings with representatives of the lead agency, the developer or project proponent, and contractors to

© 2010 The Society of Vertebrate Paleontology

explain the importance of fossils, the laws protecting fossils, the need for mitigation, the types of fossils that might be discovered during excavation work, and the procedures that should be followed if fossils are discovered. Defining the process of salvaging fossils will reduce project delays.

Paleontological Resource Mitigation Plan

Prior to any ground disturbance at the project site, a paleontological resource mitigation plan should be prepared by a qualified professional paleontologist, who then will implement the plan as the project paleontologist, program supervisor, and principal investigator. The paleontological resource mitigation plan establishes the ground rules for the entire paleontological resource mitigation program. Excavations at the project site may reveal conditions unanticipated when the paleontological resource mitigation plan was prepared. These conditions may require additional tasks not described in the previously prepared project impact mitigation plan. The project paleontologist should be the person who makes these project-specific modifications to the paleontological resource mitigation program in consultation with representatives of the lead agency and project proponent.

Adequate Monitoring

For excavations in rock units of known high potential, the project paleontologist or paleontological monitor will need to be present initially during 100% of the earth-moving activities. After 50% of excavations are complete in either an area or rock unit and no fossils of any kind have been discovered, the level of monitoring can be reduced or suspended entirely at the project paleontologist's discretion. For excavations in rock units with high or undetermined potential, it is never acceptable to have excavation monitoring done by construction workers, engineers, or persons who are not qualified paleontological resource monitors (see "definitions" section below). For excavations in rock units determined by a qualified professional paleontologist to have low potential, non-paleontologists may monitor for fossils. If potential paleontological resources are discovered during excavations in a rock unit with low potential, all ground disturbance in the vicinity of the find should stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate salvage, treatment, and future monitoring and mitigation.

Paleontologists who monitor excavations must be experienced in locating and salvaging fossils, and collecting necessary associated critical data. The paleontological resource monitor must be able to document the stratigraphic context of fossil discovery sites. Paleontological resource monitors must be properly equipped with tools and supplies to allow rapid removal of specimens. The monitor must be empowered to temporarily halt or redirect the excavation equipment away from fossils to be salvaged. Some lead agencies require that paleontological monitors be approved prior to performing any field work.

To reduce potential delays to excavation schedules, provision must be made in the mitigation program for additional assistants to monitor or help in removing large or abundant fossils. If many pieces of heavy equipment are in use simultaneously but at diverse locations, each location will need to be individually monitored.

Macrofossil Salvage

Many specimens recovered from excavations are readily visible to the eye and large enough to be easily recognized and removed. Upon discovery of such macrofossils, the monitor will flag the fossiliferous area for avoidance until the project paleontologist can evaluate the resource and develop plans for removal/salvage of these specimens. Some fossil specimens may be fragile and require consolidation

with archival quality media (e. g., Acryloid, Butvar, or Vinac) before moving. Others may require protection by encasing them within a plaster jacket before removal to a laboratory for later preparation and conservation. Occasionally specimens encompass all or much of a skeleton and will require moving either as a whole or in multiple blocks for later preparation. Such specimens require time to excavate and strengthen with a hardening solution before removal and the patience and understanding of the contractor to recover the specimens properly. It is thus important that contractors and developers are fully aware of the importance and fragility of fossils for their recovery to be undertaken with the optimum chances of successful extraction.

Avoidance and Site Protection

In exceptional instances the process of preconstruction assessment or construction monitoring itself may reveal a fossil occurrence of such importance that salvage or removal is unacceptable to all concerned parties. In such cases, the project design may need to be modified to avoid, protect and/or exhibit the fossil occurrence, e. g., in the floor or wall of a museum or as a basement exhibit in a mall. Under such circumstances, the site may be declared and dedicated as a protected resource of public value. Associated fossil fragments salvaged from such a site should be placed in an approved institutional repository. Federal land managers have the ability to set aside such exceptional areas providing documentation supports special management considerations.

Microfossil Salvage

Many significant vertebrate fossils (e. g., small mammal, bird, reptile, amphibian, or fish remains) are too small to be readily visible within the sedimentary matrix and are referred to as "microvertebrates". Small fossils also include non-vertebrate paleoenvironmental indicators (e. g., foraminifers, small gastropods, and plant seeds). Fine-grained sedimentary horizons (e. g., mudstones and paleosols) most often contain such fossils, which are typically recovered through a process of bulk matrix sampling followed by screen washing through 20 and/or 30 mesh screens. If indicators of potential microvertebrate fossils are found (e. g., plant debris, abundant mollusks, clay clasts, carbonate-rich paleosols, or mudstones) screening of a "test sample" (0.4 cubic yard/meter, ~600 lbs) may produce significant returns and indicate whether or not a larger sample needs to be screen washed. An adequate sample (standard sample) consists of approximately 4.0 cubic yards/meters (6,000 lbs or 2,500 kg) of matrix from each site, horizon, or paleosol. However, the uniqueness of the microvertebrate fossils recovered may justify screen washing even larger amounts. With this possibility in mind, two standard samples (~8.0 cubic yards/meters) or more as determined by the project paleontologist should be collected when the discovery is first made and set aside in case processing of a larger sample is later determined to be necessary. The developer must recognize that funding must be available to process these bulk matrix samples, thereby reducing volume to facilitate cost-effective storage of fossil specimens.

To avoid construction delays, samples of matrix may need to be removed from the project site and processed elsewhere. Chemicals (e. g., detergents, weak acids, orange oil, etc.) may be necessary to facilitate the breakdown of matrix. In some cases the concentrate will need to be further processed using heavy liquids (e. g., zinc bromide, polytungstate, or tetrabromide) to remove mineral grains and create a concentrate enriched with microvertebrate bones and teeth. The concentrate should be directly examined under a microscope to locate and remove individual microfossils.

Samples

To place fossils within a temporal context, dating of rock units may be necessary. If available, samples of volcanic ash and organic carbon should be collected for radiometric and/or thermoluminescence dating.

© 2010 The Society of Vertebrate Paleontology

When appropriate, oriented samples should also be collected for paleomagnetic analysis. In addition, samples of fine-grained matrices should be collected from measured stratigraphic sections for microfossil (e. g., pollen, spores, dinoflagellates, ostracodes, diatoms, foraminifers, etc.) analyses. Other matrix samples may need to be collected and retained with the samples submitted to the repository institution for future analysis, for clast source analysis, or as witness to the source rock unit and possibly for procedures not yet envisioned. The project paleontologist should determine which of these samples should be immediately processed and which samples can be stored for later processing. Many museums will not accept such rock or sediment samples for curation and storage.

Preparation

Salvaged specimens must be prepared for identification and curation (not exhibition). This means removal of all or most of the enclosing sediment to reduce the specimen volume, increase surface area for the application of consolidants/preservatives, provide repairs and stabilization of fragile/damaged areas on a specimen, and allow identification of the fossils. Large specimens may require construction of reinforced plaster or fiberglass cradles. Removal of excess matrix from macrofossils during the preparation process will facilitate identification, reduce storage space, and reduce the cost of storage. Project paleontologists need to be aware that many museums will not accept specimens that are not fully prepared for permanent curation.

Identification and Cataloging

Specimens must be identified by competent qualified paleontological specialists to the lowest taxonomic level possible. Ideally, identification of individual specimens will be to genus and species and to skeletal element. Specimens must be cataloged and a complete list of specimens to be accessioned into the collections must be prepared for the curator of the repository institution. Batch identification and batch numbering (e. g., “mammals, 75 specimens”) is unacceptable.

Analysis

Although academic research questions should dictate the field methods and types of data recorded, the overall goal of a paleontological resource mitigation program is not to conduct research but rather to discover and salvage significant fossil remains, record relevant stratigraphic and taphonomic data, and curate and permanently house the salvaged fossil remains for future study. However, before salvaged specimens are curated, either the project paleontologist or a competent qualified paleontological specialist should determine the significance and importance of the salvaged specimens and this information should be included in the final report.

Storage

Adequate curation and storage of salvaged specimens in an approved repository institution is an essential goal of the paleontological mitigation program. Adequate storage must include curation of individual specimens into the collections of a recognized, not-for-profit repository with a permanent curator, such as a museum or a university (institution). A complete set of GPS data, field notes, photographs, locality forms, and stratigraphic sections must accompany the fossil collections. Specimens must be stored in a fashion that allows retrieval of specific, individual specimens by future researchers.

Specific requirements of the designated repository must be established prior to the start of the project, field salvage work, and laboratory analysis. Adequate advance notice of funds required by the repository for curation is needed for the benefit of project funding. Costs of the project should cover the necessary curatorial supplies such as, but not limited to, trays, vials, foam, and storage cabinets or shelves to provide for the appropriate curation of the specimens.

© 2010 The Society of Vertebrate Paleontology

Reporting

1) Interim report
At the close of the excavation phase of a project, an interim report should be prepared. This interim report should summarize exceptional fossil discoveries, note areas where monitoring occurred and fossils were collected, and list tasks remaining for preparation, identification, and curation of the salvaged specimens. In the interim report, the preconstruction repository agreement should be appended and any additional repository considerations and costs should be described.

2) Final report
After preparation, identification, analysis of significance, and curatorial inventory of the salvaged specimens is complete, a final report must be prepared by the project paleontologist including a summary of the field and laboratory methods, site geology and stratigraphy, faunal/floral list(s), and a brief statement of the significance and relationship of the fossils discovered to similar fossils found elsewhere The final report should emphasize the discovery of any new or rare taxa, or paleoecological or taphonomic significance. A complete set of field notes, geologic maps, stratigraphic sections, and a list of identified specimens must be included in or accompany the final report. This report should be finalized only after all aspects of the mitigation program are completed, including preparation, identification, cataloging, and curatorial inventory.

The final report (with any accompanying documents) and repository curation of specimens and samples constitute the goals of a successful paleontological resource mitigation program. Full copies of the final report should be deposited with both the lead agency and the repository institution with the request that all locality data remain confidential and not made available to the general public.

Compliance
From the beginning of the project, the lead agency should assure compliance with measures to protect fossil resources by:

1. requesting during initial planning phases an assessment and program for impact mitigation that is consistent with these SVP Standard Procedures;

2. ensuring the adequacy of the proposed mitigation measures;

3. acknowledging arrangements for salvaged specimens to be permanently housed in an institutional paleontological repository;

4. ensuring that the paleontological resource mitigation program is supervised by a qualified professional paleontologist;

5. ensuring that all monitoring for paleontological resources is performed by qualified paleontological resource monitors;

6. inspecting the monitoring program in the field periodically during project construction;

7. ensuring that specimens are prepared, identified, cataloged, and properly curated;

8. requiring an interim and final report before issuing final occupancy permits or equivalent documents; and

9. ensuring that the final report is complete and adequately describes the methods and results of the mitigation program.

The project paleontologist should be responsible for:

1. assessing potential impacts to paleontological resources and developing a program for impact mitigation during initial planning phases;

2. obtaining a repository agreement, and ensuring repository acceptance of specimens;

3. ensuring implementation of the mitigation measures; and

4. preparing the interim and final reports.

Acceptance of the final report by the lead agency signifies completion of the program of mitigation for the project. Review and approval of the final report by a qualified professional paleontologist designated by the lead agency will determine the effectiveness of the program and adequacy of the report. Inadequate performances in either area comprise noncompliance, and may result in the lead agency removing the project paleontologist from its list of qualified professional paleontological consultants.

Definitions

A QUALIFIED PROFESSIONAL PALEONTOLOGIST (Principal Investigator, Project Paleontologist) is a practicing scientist who is recognized in the paleontological community as a professional and can demonstrate familiarity and proficiency with paleontology in a stratigraphic context. A paleontological Principal Investigator shall have the equivalent of the following qualifications:

1. A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience.
2. At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts.
3. Proficiency in recognizing fossils in the field and determining their significance.
4. Expertise in local geology, stratigraphy, and biostratigraphy.
5. Experience collecting vertebrate fossils in the field.

PALEONTOLOGICAL RESOURCE MONITORS shall have the equivalent of the following qualifications:

1. BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or
2. AS or AA in geology, paleontology, or biology and demonstrated two years experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or
3. Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project.

© 2010 The Society of Vertebrate Paleontology

4. Monitors must demonstrate proficiency in recognizing various types of fossils, in collection methods, and in other paleontological field techniques.

ASSOCIATED CRITICAL DATA includes adequate field notes, sketches of stratigraphic sections, geologic maps, and site and specimen photos. Associated critical data may also include samples of organic carbon and volcanic ash for radiometric dating, oriented samples for paleomagnetic analysis, samples for microfossil analysis, and samples for determining the sediment source.

A **PALEONTOLOGICAL REPOSITORY** is a not-for-profit museum or university approved by the lead agency and employing a permanent curator responsible for paleontological records and specimens. Such an institution assigns accession, locality, and/or catalog numbers to individual specimens that are stored and conserved to ensure their preservation under adequate security against theft, loss, damage, fire, pests, and adverse climate conditions. Specimens will be stored in a stable environment away from flammable liquids, corrosive chemicals, organic materials subject to mildew, and sources of potential water damage. Specimens must have all modifications, preparation techniques, etc. documented and linked with the specimen. The repository will also archive lists of collected specimens, and any associated field notes, maps, photographs, diagrams, or other data. The repository must have procedures for tracking specimens removed from storage for study, preparation, exhibit, or loan. The repository must make its collections of cataloged specimens available for study by qualified researchers.

ARCHAEOLOGICAL RESOURCES are human remains and items or artifacts associated with human cultures. If paleontological resources are determined to be in close stratigraphic association with human remains or human manufactured items, or if fossils can be demonstrated to be intentionally modified by humans, they are also considered archaeological resources.

SIGNIFICANT PALEONTOLOGICAL RESOURCES are fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i. e., older than about 5,000 radiocarbon years).

A **LEAD AGENCY** is the agency responsible for addressing impacts to resources that a specific project might cause, and for ensuring compliance with approved mitigation measures.

PALEONTOLOGICAL POTENTIAL is the potential for the presence of significant paleontological resources. All sedimentary rocks, some volcanic rocks, and some low-grade metamorphic rocks have potential to yield significant paleontological resources. Paleontological potential is determined only after a field survey of a rock unit in conjunction with a review of available literature and relevant paleontological locality records.

© 2010 The Society of Vertebrate Paleontology

EXHIBIT E

M (/)

Service Change

Bus service may experience delays due to a nationwide labor shortage. We appreciate your patience and understanding as we work to address this challenge. Per federal law, face masks are still required on all buses and trains.

(https://mybus.metro.net)

Maps & Schedules

Search by rail line or bus number

Example: A line or 804

Rail Lines

Metro A Line (Blue)
Downtown LA - Long Beach
(?line=801)

Metro B Line (Red)
Union Station - North Hollywood
(?line=802)

Metro C Line (Green)
Norwalk - Redondo Beach
(?line=803)

Metro L Line (Gold)
Azusa - Union Station - East LA
(?line=804)

Metro D Line (Purple)
Union Station - Wilshire/Western

Bus Lines

2 **Downtown LA - Westwood via Sunset Bl**
(?line=2-13149)

4 Downtown LA - Santa Monica via Santa Monica Bl

(?line=4-13149)

10/48 West Hollywood - Downtown LA - Avalon Station via Melrose Av & Main St

(?line=10-13149)

14/37 Beverly Center - Downtown LA - Washington/Fairfax via Beverly Bl & Adams Bl

(?line=14-13149)

16 Downtown LA - West Hollywood via West 3rd St

(?line=16-13149)

18 Wilshire Western Station - Montebello Metrolink Station via 6th St & Whittier Bl

(?line=18-13149)

C Line (Green) - SoFi Stadium/SOFI

(?line=SOFI)

20 Downtown LA - Westwood/Santa Monica via Wilshire Bl

(?line=20-13149)

28 Century City - Downtown LA via Olympic Bl

(?line=28-13149)

30 Pico Rimpau Transit Center - Downtown LA - Indiana Station via Pico Bl & 1st St

(?line=30-13149)

33 Downtown LA - Santa Monica via Venice Bl

(?line=33-13149)

35/38 Downtown LA - Washington/Fairfax via Washington Bl & Jefferson Bl

(?line=35-13149)

40 Downtown LA - South Bay Galleria via ML King Bl-Hawthorne Bl

(?line=40-13149)

45 Lincoln Heights - Downtown LA - Harbor Freeway Station via Broadway

(?line=45-13149)

51 Wilshire Center - Downtown LA - CSU University Dominguez Hills via 7th St & Avalon Bl

(?line=51-13149)

53 Downtown LA - CSU Dominguez Hills via Central Av

(?line=53-13149)

55 Downtown LA - Willowbrook Station via Compton Av

(?line=55-13149)

60 Downtown LA - Artesia Station via Long Beach Bl

(?line=60-13149)

62 Downtown LA - Hawaiian Gardens via Telegraph Rd

(?line=62-13149)

66 Wilshire Center - Downtown LA - Montebello via 8th St - Olympic Bl

(?line=66-13149)

70 Downtown LA - El Monte via Cesar Chavez Av/Atlantic Bl/Garvey Av

(?line=70-13149)

76 Downtown LA - El Monte via Valley Bl

(?line=76-13149)

78/79 Downtown LA - Arcadia via Las Tunas Av & Huntington Dr

(?line=78-13149)

81 Eagle Rock - Downtown LA - Harbor Freeway Station via Figueroa St

(?line=81-13149)

90 LA Civic Center - Sunland - North Hollywood via Glendale Av-Foothill Bl-Vineland Av

(?line=90-13149)

92 Downtown LA - Sylmar Station via Glendale-Glenoaks Bl

(?line=92-13149)

94 Metro Local - Downtown LA - Glendale - Burbank - North Hollywood via San Fernando Rd and

94 Magnolia Bl

(?line=94-13149)

96 Chinatown - Burbank Station via Griffith Park Dr

(?line=96-13149)

102 LAX City Bus Center - South Gate via La Tijera-Exposition Blvds

(?line=102-13149)

105 West Hollywood - Vernon via La Cienega Bl/Vernon Av

(?line=105-13149)

106 Monterey Park - Cal State LA - LA Union Station - Little Tokyo - Montebello via Garvey Av & 1st St

(?line=106-13149)

108 Marina Del Rey - Pico Rivera via Slauson Av

(?line=108-13149)

110 Playa Vista - Bell Gardens via Jefferson Bl-Gage Av

(?line=110-13149)

111 LAX City Bus Center - Norwalk Station via Florence Av

(?line=111-13149)

115 Playa Del Rey - Norwalk via Manchester Av - Firestone Bl

(?line=115-13149)

117 LAX City Bus Center - Downey via Century Bl-Imperial Hwy

(?line=117-13149)

120 Aviation/LAX Station - Whittwood Center via Imperial Hwy

(?line=120-13149)

125 El Segundo - Norwalk Station via Rosecrans Av

(?line=125-13149)

127 Harbor Freeway Station - Comption Station - Downey via Compton Bl-Broadway

(?line=127-13149)

128 Compton Station - Cerritos Towne Center via Alondra Bl

(?line=128-13149)

130 Cerritos - Artesia Station via Artesia Bl

(?line=130-13149)

150 Chatsworth - Canoga Park - Tarzana via Topanga Canyon Bl-Ventura Bl

(?line=150-13149)

152 West Hills Medical Center - North Hollywood Station via Roscoe Bl

(?line=152-13149)

154 Sepulveda Bl - Burbank Station via Oxnard St-Burbank Bl

(?line=154-13149)

155 Sherman Oaks - Burbank Station via Riverside Dr-Olive St

(?line=155-13149)

158 Chatsworth Station - Sherman Oaks via Devonshire-Woodman

(?line=158-13149)

161 Thousand Oaks - Agoura Hills - Calbasas - Warner Center

(?line=161-13149)

162 Woodland Hills - West Hills - North Hollywood via Sherman Way-Vineland Av

(?line=162-13149)

164 West Hills - Burbank via Victory Bl

(?line=164-13149)

165 West Hills - Burbank via Vanowen St

(?line=165-13149)

166 Canoga Av - Sun Valley via Nordhoff St-Osborne St

(?line=166-13149)

167 Chatsworth Station - Studio City via Plummer-Coldwater Canyon

(?line=167-13149)

169 Warner Center - Burbank Airport via Valley Circle-Saticoy St

(?line=169-13149)

177 JPL - Pasadena (Caltech)

(?line=177-13149)

180 Hollywood - Glendale - Pasadena via Los Feliz-Colorado

(?line=180-13149)

182 NorthEast LA - East Hollywood

(?line=182-13149)

200 Echo Park - Exposition Park via Alvarado St-Hoover St

(?line=200-13149)

202 Willowbrook - Compton - Del Amo Station

(?line=202-13149)

204 Hollywood - Athens via Vermont Av

(?line=204-13149)

205 Willowbrook Station - San Pedro via Wilmington Av-Vermont Av

(?line=205-13149)

206 Hollywood - Athens via Normandie Av

(?line=206-13149)

207 Hollywood - Athens via Western Av

(?line=207-13149)

209 Expo/Crenshaw Station - Crenshaw C Line (Green) Station via Van Ness Av-Arlington Av

(?line=209-13149)

210 Hollywood/Vine Station - South Bay Galleria via Vine St, Wilshire/Western Station, Crenshaw Bl

(?line=210-13149)

211/215 Inglewood-South Bay Galleria via Prairie Av-Inglewood Av

211/215 Inglewood-South Bay Galleria via Prairie Av-Inglewood Av

(?line=211-13149)

212 Hollywood/Vine Station - Hawthorne/Lennox Station via La Brea Av

(?line=212-13149)

217 Hollywood/Vine Station - La Cienega Station via Hollywood Bl-Fairfax Av

(?line=217-13149)

218 Studio City - Cedars Sinai Medical Center via Laurel Canyon Bl-Fairfax Bl

(?line=218-13149)

222 Lankershim/Tuxford - Burbank Airport - Hollywood via Hollywood Way & Cahuenga Bl

(?line=222-13149)

224/690 Sylmar Station - Universal City Station via San Fernando Rd & Lankershim Bl (+ Hollywood Owl service)

(?line=224-13149)

230 Mission College - Studio City via Laurel Canyon Bl

(?line=230-13149)

232 LAX City Bus Center - Long Beach - via Sepulveda Bl-Pacific Coast Hwy

(?line=232-13149)

233 Lake View Terrace - Sherman Oaks via Van Nuys Bl (+ Westside Owl service)

(?line=233-13149)

234 Sylmar - Sherman Oaks - West LA via Sepulveda Blvd

(?line=234-13149)

235/236 Sylmar - Encino via Balboa Bl-Glenoaks Bl

(?line=236-13149)

237 Encino-Granada Hill-Mission Hills-North Hollywood via White Oak Av-Woodley Av-Chandler

(?line=237-13149)

240 Northridge - Universal City Station via Reseda Bl-Ventura Bl

(?line=240-13149)

242/243 Devonshire St - Woodland Hills via Tampa Av-Winnetka Av

(?line=242-13149)

244 Chatsworth Station - Ventura Bl via De Soto Av

(?line=244-13149)

246 San Pedro - Harbor Gateway Transit Center via Avalon Bl

(?line=246-13149)

251 Cypress Park - Long Beach Blvd C Line (Green) Station via Soto St

(?line=251-13149)

256 Commerce - Sierra Madre Villa Station via Eastern Ave-Ave 64-Washington Bl

(?line=256-13149)

258 Highland Park/South Pasadena - Paramount via Fremont Av-Eastern Av

(?line=258-13149)

260 Altadena - Artesia Station via Fair Oaks Av-Atlantic Bl

(?line=260-13149)

265 Pico Rivera - Lakewood Center Mall via Paramount Bl

(?line=265-13149)

266 Sierra Madre Villa Station - Lakewood Center Mall via Rosemead Bl

(?line=266-13149)

267 Pasadena - El Monte Station via Del Mar Bl & Temple City Bl

(?line=267-13149)

268 Sierra Madre Villa Station - El Monte Station via Baldwin Av

(?line=268-13149)

287 El Monte Station - Arcadia Station via Santa Anita Av

(?line=287-13149)

SYSTEM MAPS (/RIDING/SYSTEM-MAPS/) | PLAN A TRIP (/RIDING/TRIP-PLANNER/) | VIEW SERVICE CHANGES (/SERVICE/ADVISORIES/)

About Metro (https://www.metro.net/about/about-metro/)

Fares and Passes (https://www.metro.net/riding/fares/)

How to Ride (https://www.metro.net/riding/guide/)

The Source (https://thesource.metro.net/)

Accessibility (https://www.metro.net/riding/riders-disabilities/)

Employee Self Service (http://fisesss.mta.net/OA_HTML/AppsLocalLogin.jsp)

El Pasajero (https://elpasajero.metro.net/)

Metro Intranet (https://www.metro.net/mymetro)

(http://www.linkedin.com/company/los-angeles-county-metropolitan-transportation-authority/mycompany/)

Privacy Policy (https://www.metro.net/about/privacy-policy/) |

Terms of Use (https://www.metro.net/about/copyright/)

Copyright © 2021-2022 Metro

Letter 29

COMMENTER: Mitchell M. Tsai, on behalf of the Southwest Regional Council of Carpenters

DATE: November 29, 2021

Response 29.1

The commenter, on behalf of "Southwest Regional Council of Carpenters" describes the client, states his client reserves the right to supplement the comments on the Recirculated Draft EIR (in addition to during public hearings), and requests forwarding of any and all notices for the project under CEQA.

As requested, the City will forward CEQA public notices to the commenter. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required. Individual responses regarding the commenter's concerns on environmental impacts are addressed in the responses to letter 18 and in responses 29.2 through 29.16.

Response 29.2

The commenter suggests that the City consider requiring the project applicant to use local hires and a skilled and trained workforce with specific training experience. The commenter provides explanation and a letter attachment that describes how skilled and trained workforce requirements yield sustainable economic development, air pollution reductions, VMT reductions, and GHG reductions.

Please see Response 18.2. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.3

The commenter suggests that the City require the project to be built to standards exceeding those required by the 2019 California Green Building Standards Code (CALGreen) to mitigate the project's environmental impacts and to advance progress towards the State of California's environmental goals.

Please see Response 18.3. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.4

The commenter provides a general summary and the commenter's own interpretation concerning CEQA and the EIR process.

Please see Response 18.4. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.5

The commenter provides a general summary and the commenter's interpretation of the requirements for recirculation of an EIR under CEQA.

As discussed in the individual responses to the commenter's letter, the City has determined that no significant new information has been raised and that recirculation of the Recirculated Draft EIR is not warranted. Please refer to Responses 29.6 through 29.16.

Response 29.6

The commenter states an opinion that the Recirculated Draft EIR should identify a significant impact related to the public health risk of COVID-19 on construction workers. The commenter provides a recommended list of construction site work practices to reduce public health risk.

Please see Response 18.6. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.7

The commenter asserts that the project is not within a transit priority area (TPA) because there are no major transit stops within a half-mile of the project site because several bus lines cited in the Recirculated Draft EIR are no longer in operation.

The comment cites the definition of transit priority areas per the California Public Resources Code and proceeds to make a variety of arguments as to why that designation is not appropriate for the project site. As shown below the comment does not provide substantial evidence to support this claim or accurately reflect the standard industry practice for applying the TPA designation, as the City has done consistent with state law.

The comment points out that there have been changes to the Metro routes as of November 29, 2021. The changes, part of Metro's "NextGen" system redesign will be occurring over multiple phases between the fall of 2021 and 2022[2]. Therefore, consistent with standard industry practice for environmental analysis, the baseline environmental setting informing the analysis accurately was initiated reflecting the bus lines at the time the Notice of Preparation (NOP) was prepared

[2] *LA Metro. 2020. "NextGen Bus Plan – LA Metro" https://www.metro.net/about/plans/nextgen-bus-plan/.*

for this project. Since the NOP there have been changes to bus service and the City's approach to determining transportation impacts in a CEQA analysis as described in the City's latest Transportation Impact Study Guidelines. The analysis presented in the DEIR reflects the ongoing implementation of NextGen and most recent bus schedules available from Metro when the analysis was conducted in August 2021. Despite the changes to bus service, the project site is in a location that meets the definition of the TPA designation for the baseline condition and also meets the definition of a TPA when Metro's ongoing changes are accounted for. For significant corridors, such as Santa Monica Boulevard, the NextGen bus changes were intended to consolidate the existing local route (Route 4) and the Rapid Route (704) to provide similar or more frequent transit service. The discrepancies for the transit lines are not a misrepresentation of the data and reflect the implementation of a multi-year planning effort undertaken by Metro and the timing of the multiphase implementation, which included consolidation of the Metro Rapid and Local Lines on the same corridor.

The commentor suggests that the timetables for the routes cited do not meet the 15-minute service frequency interval. Two lines remain in place following the NextGen Bus Plan modifications that meet the definition of a TPA and that are cited in the analysis, Line 4 and Line 105. The Metro bus timetables are provided at the conclusion of this response and show they operate at intervals of 15-minute or less during the peak commute periods (7AM-10AM and 4PM-7PM).

The commentor then suggests that even if the timetables were accurate, the actual on-time performance for the routes cited do not meet the 15-minute service frequency interval. The comment does not provide any substantial evidence in support of this claim. In an attempt to provide evidence that transit service does not meet the frequency intervals for TPA screening the commentor relies on references to the GTFS database, local news articles, and a screenshot of a time table for what appears to be Metro Line 4. The commentor inconsistently refers to published schedules and arrival predictions and selectively exhibits schedule times. When reviewing all of the available information, it supports the finding that a TPA is an appropriate designation based on the operation of Line 4 and Line 105, both of which operate at a frequency of less than 15 minutes during the peak periods and were included in the analysis:

- GTFS data is cited, however, this is just a link to a database and the application of this database for on-time arrival is not consistent with the GTFS database parameters as explained in the second bullet below.
    - Footnote 15 is a link to a website, there is no information provided with either schedules or arrival information (other than a reference to bus schedules in footnote 14 that is specifically in reference to Metro Line 2, not Line 4 or 105) that show the operation of Metro Line 4 and Metro Line 105 do not meet the definition of a TPA
    - GTFS.org provides guidance language regarding the intended use and application of the GTFS database. Based on the language below, it is appropriate to conclude that the GTFS is a database used as a planning tool that predicts information and is used to communicate schedules. The database information cited does not demonstrate that local transit routes are not meeting the criteria for a TPA and no information is presented through the GTFS website that is specific to Metro Line 4 or Line 105. Additionally, the application of this data is not consistent with the purpose described on the GTFS.org website:

  - "GTFS is split into a static component that contains schedule, fare, and geographic transit information and a real-time component that contains ***arrival predictions***, vehicle positions, and service advisories." [emphasis added] (https://gtfs.org/)
  - "Among public transportation data formats, GTFS stands out because it was conceived to meet specific practical needs in communication service information to passengers, not as an exhaustive vocabulary for managing operational details." (https://gtfs.org/gtfs-background/)

- Local news articles: the article cites an online news article that purports to show that Metro Line 4 and Metro Line 105 do not meet the definition of a TPA.
  - This article does not provide any information specifically regarding Metro Line 4 or Metro Line 105
  - The second paragraph of the article states: "While there is some quantitative information about the latest Metro bus issues, many of the stories are anecdotal." Again, no data is provided to support the operation of local Metro bus lines and underscores that the commentor's claims are based on anecdotal and incomplete information.
  - The link below describes the on-going Metro bus reorganization, in conjunction with COVID operations, that have led to changes to some bus lines, such as elimination of the Metro Rapid 704 and increasing the frequency of Metro Line 4. These changes do not eliminate the TPA designation based on Metro Line 4 and Line 105. Information relating to on-going service changes has been posted regularly, as recently as December 13, 2021 on Metro's website The Source: https://thesource.metro.net/2021/12/13/reminder-new-schedules-start-this-sunday-dec-19/.

- Timetable screenshot: the comment includes a single screen shot of a single timetable for a single day and time period (also note the time period shown does not coincide with the peak period) that is purported to show that Metro Line 4 does not operate with 15-minute headways.
  - The source of this data is not specified, nor how it was collected, or what day it represents. The information at the top displays Metro 4, however, it also seems to show a date of Tuesday, November 30th. Given the letter is dated November 29th, it would suggest that this information is not a reflection of actual on-time performance and instead a schedule or prediction of arrival, consistent with GTFS' capability to use this as a planning tool, rather than a determinant of on-time performance.
  - The selection of this time period suggests the 15-mimute interval is not met. As shown in the published schedules, both dated prior to November 30, 2021, the peak hour headways of both lines meet the TPA definition. The real time Transit App information also supports this conclusion. The screenshot provided in the comment letter is not reflective of information published by Metro. Details on the data source are not provided and the information can not properly be assessed for accuracy, nor does it provide enough evidence to conclude that the Metro buses are operating in a way that does not meet the TPA definition.

Whether basing this determination on bus schedules or real time arrival predictions from sources like the Transit App (https://transitapp.com/), which uses GTFS data as the basis for arrival time prediction, both sources cited in this response show that these lines operate with peak hour frequency of 15 minutes or less in the AM and PM peak hours. Provided at the end of this response are:

- The most recent official timetables for Metro Line 4 and Metro Line 105
- Arrival prediction screenshots from the Transit App for the PM and AM peak hours on December 14 and 20, 2021

As demonstrated, officially published Metro Line 4 and Metro Line 105 schedules meet the definition of a TPA per state law and as determined by the City of West Hollywood. Real-time information can be useful for evaluating the actual conditions but is subject to the conditions at the time it is recorded; if the commentor takes a screen capture on any given day, the exact arrival predictions could vary. In the screenshots provided with this response, real-time information confirms that there may be daily variability and buses generally adhere to published schedules.

Current Metro schedule for Line 105:

Monday through Friday

Effective Jun 27 2021

105

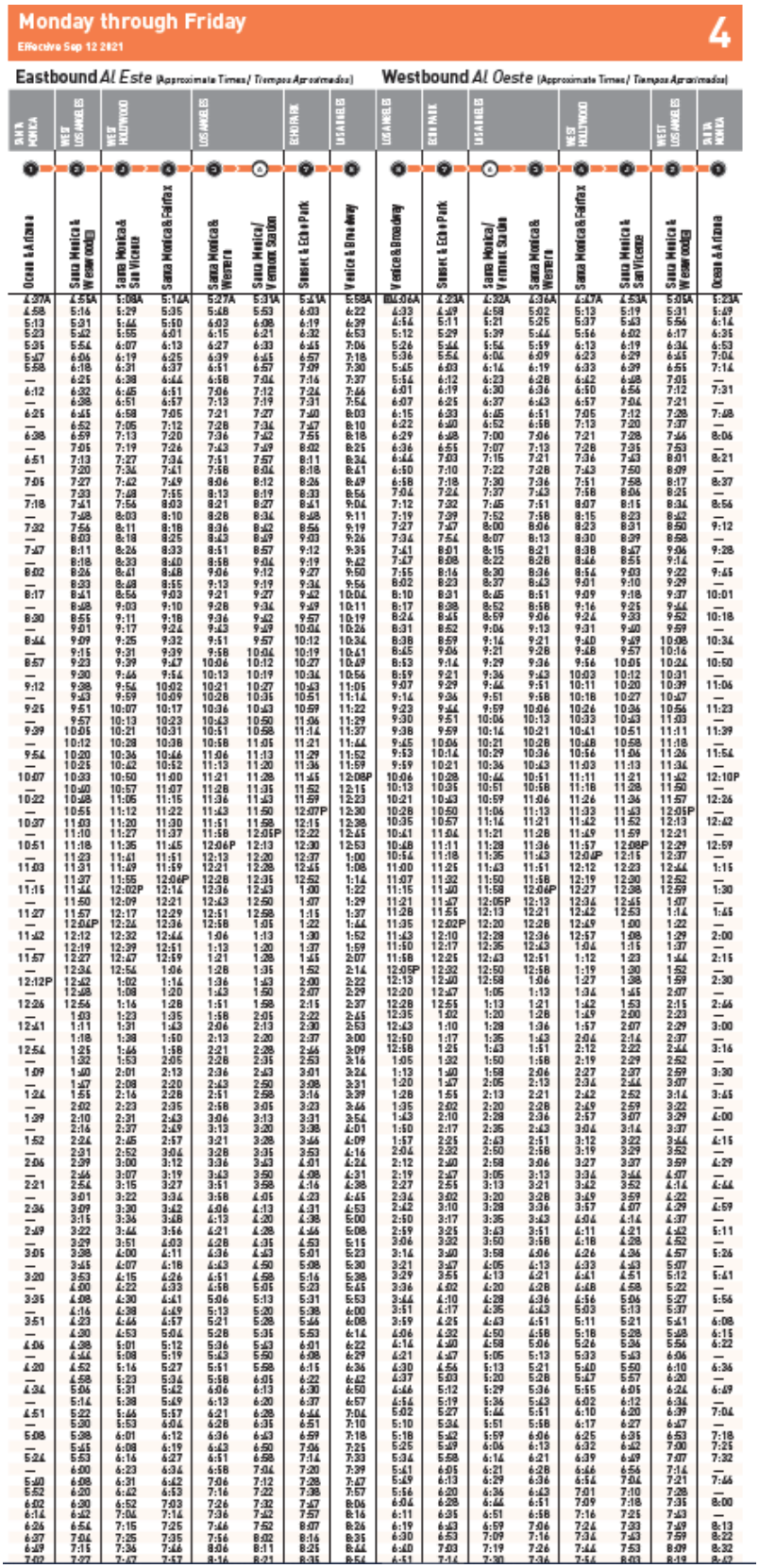
Southbound - Eastbound (Approximate Times)

WEST HOLLYWOOD	IRVINE HILLS	LOS ANGELES		LEIMERT PARK	LOS ANGELES		VERNON
1	2	3	4	5	6	7	8
San Vicente & Santa Monica	La Cienega & Wilshire	Washington / Fairfax Transit Hub	Crenshaw & La Brea	King & Crenshaw	Vermont & Vernon	Vermont & Central	Pacific & Santa Fe
4:00A	4:10A	4:20A	4:28A	4:35A	4:46A	4:54A	5:00A
4:30	4:40	4:50	4:58	5:05	5:17	5:27	5:34
—	—	5:02	5:10	5:17	5:29	5:39	5:46
4:52	5:02	5:12	5:20	5:27	5:39	5:49	5:56
—	—	5:22	5:30	5:37	5:49	5:59	6:06
5:10	5:21	5:31	5:40	5:47	5:59	6:10	6:17
—	—	5:41	5:50	5:57	6:10	6:21	6:28
5:29	5:40	5:51	6:00	6:07	6:20	6:31	6:38
—	—	6:01	6:10	6:17	6:30	6:41	6:48
5:47	6:00	6:11	6:20	6:27	6:40	6:51	6:58
—	—	6:20	6:29	6:37	6:50	7:01	7:08
6:06	6:19	6:30	6:39	6:47	7:00	7:11	7:18
—	—	6:40	6:49	6:57	7:10	7:21	7:28
6:28	6:39	6:50	6:59	7:07	7:20	7:31	7:38
—	—	7:00	7:09	7:17	7:30	7:41	7:48
6:46	6:59	7:10	7:19	7:27	7:41	7:52	7:59
6:56	7:09	7:20	7:29	7:37	7:51	8:02	8:09
7:06	7:19	7:30	7:39	7:47	8:01	8:12	8:19
7:17	7:28	7:40	7:49	7:57	8:11	8:23	8:30
7:25	7:38	7:50	7:59	8:07	8:21	8:33	8:40
7:35	7:48	8:00	8:09	8:17	8:31	8:43	8:50
7:44	7:57	8:10	8:19	8:27	8:41	8:53	9:00
7:54	8:07	8:20	8:29	8:37	8:51	9:03	9:10
8:04	8:17	8:30	8:39	8:47	9:01	9:13	9:20
8:14	8:27	8:40	8:49	8:57	9:12	9:24	9:31
8:23	8:37	8:50	8:59	9:08	9:23	9:35	9:42
8:32	8:46	8:59	9:09	9:18	9:33	9:45	9:52
8:44	8:56	9:09	9:19	9:28	9:43	9:55	10:02
8:51	9:05	9:19	9:29	9:38	9:53	10:05	10:12
9:01	9:15	9:29	9:39	9:48	10:04	10:16	10:23
9:11	9:25	9:39	9:49	9:58	10:14	10:26	10:33
9:21	9:35	9:49	9:59	10:08	10:24	10:36	10:44
9:31	9:45	9:59	10:09	10:18	10:34	10:46	10:54
9:41	9:55	10:09	10:19	10:28	10:45	10:57	11:05
9:50	10:05	10:19	10:29	10:39	10:56	11:08	11:16
9:59	10:14	10:28	10:39	10:49	11:06	11:18	11:26
10:08	10:23	10:38	10:49	10:59	11:16	11:28	11:36
10:18	10:33	10:48	10:59	11:09	11:26	11:38	11:46
10:27	10:43	10:58	11:09	11:19	11:36	11:48	11:56
10:36	10:52	11:08	11:19	11:29	11:46	11:58	12:06P
10:46	11:02	11:18	11:29	11:39	11:56	12:08P	12:16
10:55	11:12	11:28	11:39	11:49	12:06P	12:18	12:26
11:07	11:22	11:38	11:49	11:59	12:16	12:28	12:36
11:15	11:32	11:48	11:59	12:09P	12:26	12:38	12:46
11:24	11:41	11:57	12:09P	12:19	12:36	12:48	12:56
11:34	11:51	12:07P	12:19	12:29	12:46	12:58	1:07
11:44	12:01P	12:17	12:29	12:39	12:56	1:08	1:17
11:53	12:10	12:26	12:39	12:49	1:06	1:18	1:27
12:03P	12:20	12:36	12:49	12:59	1:16	1:28	1:37
12:12	12:29	12:46	12:59	1:09	1:26	1:38	1:47
12:22	12:39	12:56	1:09	1:19	1:36	1:48	1:57
12:32	12:49	1:06	1:19	1:29	1:46	1:58	2:07
12:42	12:59	1:16	1:29	1:39	1:56	2:08	2:17
12:52	1:09	1:26	1:39	1:49	2:06	2:18	2:27
1:02	1:19	1:36	1:49	1:59	2:16	2:28	2:37
1:12	1:29	1:46	1:59	2:09	2:26	2:38	2:47
1:22	1:39	1:56	2:09	2:19	2:36	2:48	2:57
1:32	1:49	2:06	2:19	2:29	2:46	2:58	3:07
1:42	1:59	2:16	2:29	2:39	2:56	3:08	3:17
1:52	2:09	2:26	2:39	2:49	3:06	3:18	3:27
2:02	2:19	2:36	2:49	2:59	3:16	3:28	3:37
2:12	2:29	2:46	2:59	3:09	3:26	3:38	3:47
2:22	2:39	2:56	3:09	3:19	3:36	3:48	3:57
2:32	2:49	3:06	3:19	3:29	3:46	3:58	4:07
2:42	2:59	3:16	3:29	3:39	3:56	4:08	4:17
2:52	3:09	3:26	3:39	3:49	4:06	4:18	4:27
3:02	3:19	3:36	3:49	3:59	4:16	4:28	4:37
3:12	3:29	3:46	3:59	4:09	4:26	4:39	4:48
3:22	3:39	3:56	4:09	4:19	4:36	4:49	4:58
3:32	3:49	4:06	4:19	4:29	4:46	4:59	5:08
3:42	3:59	4:16	4:29	4:39	4:56	5:09	5:18
3:52	4:09	4:26	4:39	4:49	5:06	5:19	5:27
4:02	4:19	4:36	4:49	4:59	5:16	5:29	5:37
4:12	4:29	4:46	4:59	5:09	5:26	5:39	5:47
4:22	4:39	4:56	5:09	5:19	5:36	5:49	5:57
4:32	4:49	5:06	5:19	5:29	5:46	5:59	6:07
4:42	4:59	5:16	5:29	5:39	5:56	6:09	6:17
4:52	5:09	5:26	5:39	5:49	6:06	6:19	6:27
5:02	5:19	5:36	5:49	5:59	6:16	6:29	6:37
5:12	5:29	5:46	5:59	6:09	6:26	6:38	6:46
5:22	5:39	5:56	6:09	6:19	6:36	6:48	6:56
5:32	5:49	6:06	6:19	6:29	6:46	6:58	7:06
5:45	6:02	6:19	6:32	6:42	6:59	7:11	7:19
6:01	6:18	6:34	6:46	6:56	7:12	7:24	7:32
6:17	6:34	6:49	7:01	7:11	7:27	7:38	7:45
6:33	6:50	7:05	7:17	7:27	7:42	7:53	8:00
6:50	7:07	7:22	7:33	7:42	7:57	8:08	8:15
7:07	7:24	7:38	7:48	7:57	8:12	8:23	8:30
7:28	7:44	7:58	8:08	8:17	8:32	8:43	8:50
7:53	8:09	8:23	8:33	8:42	8:56	9:07	9:14

Westbound-Northbound (Approximate Times)

VERNON	LOS ANGELES		LEIMERT PARK	LOS ANGELES		IRVINE HILLS	WEST HOLLYWOOD
8	7	6	5	4	3	2	1
Vermont & Santa Fe	Vermont & Central	Vermont & Vernon	King & Crenshaw	Crenshaw & La Brea	Washington / Fairfax Transit Hub	La Cienega & Wilshire	San Vicente & Santa Monica
4:16A	4:21A	4:30A	4:42A	4:50A	4:57A	5:08A	5:19A
4:46	4:51	5:00	5:12	5:20	5:27	5:38	5:50
5:11	5:17	5:27	5:39	5:47	5:54	6:06	6:19
5:26	5:32	5:42	5:54	6:02	6:10	6:22	6:35
5:40	5:46	5:56	6:09	6:18	6:26	6:38	6:51
5:51	5:57	6:08	6:21	6:30	6:38	6:50	7:03
6:00	6:07	6:18	6:31	6:40	6:48	7:00	7:13
6:10	6:17	6:28	6:41	6:50	6:58	7:12	7:25
6:20	6:27	6:38	6:51	7:00	7:08	7:22	7:35
6:30	6:37	6:48	7:01	7:10	7:18	7:32	7:45
6:40	6:47	6:58	7:11	7:20	7:28	7:42	7:55
6:49	6:56	7:08	7:21	7:30	7:38	7:52	8:06
6:59	7:06	7:18	7:31	7:40	7:48	8:02	8:16
7:08	7:15	7:27	7:41	7:50	7:58	8:12	8:26
7:18	7:25	7:37	7:51	8:00	8:09	8:23	8:37
7:28	7:35	7:47	8:01	8:10	8:19	8:33	8:48
7:38	7:45	7:57	8:11	8:20	8:29	8:44	8:59
7:48	7:55	8:07	8:21	8:30	8:39	8:54	9:09
7:58	8:05	8:17	8:31	8:40	8:49	9:05	9:20
8:08	8:15	8:27	8:41	8:50	8:59	9:15	9:30
8:18	8:25	8:37	8:51	9:00	9:09	9:25	9:40
8:27	8:34	8:46	9:00	9:10	9:19	9:35	9:50
8:35	8:43	8:55	9:10	9:20	9:29	9:45	10:00
8:44	8:52	9:04	9:20	9:30	9:39	9:55	10:10
8:54	9:02	9:14	9:30	9:40	9:49	10:05	10:20
9:04	9:12	9:24	9:40	9:50	9:59	10:15	10:30
9:14	9:22	9:34	9:50	10:00	10:09	10:25	10:40
9:23	9:31	9:44	10:00	10:10	10:19	10:35	10:51
9:32	9:40	9:53	10:10	10:20	10:30	10:46	11:02
9:42	9:50	10:03	10:20	10:30	10:40	10:56	11:13
9:52	10:00	10:13	10:30	10:40	10:50	11:06	11:23
10:01	10:10	10:23	10:40	10:50	11:00	11:16	11:33
10:11	10:20	10:33	10:50	11:00	11:10	11:26	11:43
10:21	10:30	10:43	11:00	11:10	11:20	11:36	11:53
10:30	10:39	10:52	11:10	11:20	11:30	11:47	12:04P
10:40	10:49	11:02	11:20	11:30	11:41	11:58	12:16
10:50	10:59	11:12	11:30	11:40	11:51	12:08P	12:26
11:00	11:09	11:22	11:40	11:50	12:01P	12:18	12:36
11:10	11:19	11:32	11:50	12:00P	12:11	12:28	12:46
11:19	11:28	11:41	11:59	12:10	12:21	12:38	12:56
11:29	11:38	11:51	12:09P	12:20	12:31	12:48	1:06
11:39	11:48	12:01P	12:19	12:30	12:41	12:58	1:16
11:49	11:58	12:11	12:29	12:40	12:51	1:08	1:26
11:59	12:08P	12:21	12:39	12:50	1:01	1:18	1:36
12:09P	12:18	12:31	12:49	1:00	1:11	1:28	1:46
12:19	12:28	12:41	12:59	1:10	1:21	1:38	1:56
12:29	12:38	12:51	1:09	1:20	1:31	1:48	2:06
12:39	12:48	1:01	1:19	1:30	1:41	1:58	2:16
12:49	12:58	1:11	1:29	1:40	1:51	2:09	2:27
12:59	1:08	1:21	1:39	1:50	2:01	2:18	2:36
1:09	1:18	1:31	1:49	2:00	2:12	2:29	2:47
1:19	1:28	1:41	1:59	2:10	2:22	2:39	2:57
1:29	1:38	1:51	2:09	2:20	2:32	2:49	3:07
1:39	1:48	2:01	2:19	2:30	2:42	2:59	3:17
1:49	1:57	2:11	2:29	2:40	2:52	3:09	3:27
1:57	2:07	2:21	2:39	2:50	3:02	3:19	3:37
2:07	2:17	2:31	2:49	3:00	3:12	3:29	3:46
2:17	2:27	2:41	2:59	3:10	3:22	3:38	3:55
2:27	2:37	2:51	3:09	3:20	3:32	3:48	4:05
2:37	2:47	3:01	3:19	3:30	3:41	3:57	4:14
2:47	2:57	3:11	3:29	3:40	3:51	4:07	4:24
2:57	3:07	3:21	3:39	3:50	4:01	4:17	4:34
3:07	3:17	3:31	3:49	4:00	4:11	4:27	4:44
3:18	3:28	3:41	3:59	4:10	4:21	4:37	4:54
3:25	3:36	3:49	4:07	4:18	4:29	4:44	5:01
3:34	3:45	3:58	4:16	4:27	4:38	4:53	5:10
3:42	3:53	4:06	4:24	4:35	4:46	5:01	5:18
3:51	4:02	4:15	4:33	4:44	4:55	5:10	5:29
3:59	4:10	4:23	4:41	4:52	5:03	5:18	5:37
4:08	4:19	4:32	4:50	5:01	5:12	5:27	5:44
4:16	4:27	4:40	4:58	5:09	5:20	5:35	5:54
4:26	4:36	4:49	5:07	5:18	5:29	5:44	6:01
4:34	4:44	4:57	5:15	5:26	5:36	5:51	6:08
4:43	4:53	5:06	5:24	5:35	5:45	6:00	6:19
4:51	5:01	5:14	5:32	5:43	5:53	6:08	6:27
5:01	5:11	5:24	5:41	5:52	6:02	6:17	6:34
5:09	5:19	5:32	5:49	6:00	6:10	6:25	6:42
5:18	5:28	5:41	5:58	6:09	6:19	6:34	6:50
5:26	5:36	5:49	6:06	6:17	6:27	6:42	6:58
5:35	5:45	5:58	6:15	6:26	6:36	6:51	7:08
5:43	5:53	6:06	6:23	6:34	6:44	6:59	7:16
5:52	6:02	6:15	6:32	6:43	6:53	7:08	7:25
6:01	6:10	6:23	6:40	6:51	7:01	7:16	7:32
6:10	6:19	6:32	6:49	7:00	7:09	7:24	7:41
6:22	6:31	6:44	7:01	7:11	7:20	7:35	7:52
6:38	6:46	6:59	7:15	7:25	7:34	7:49	8:06
6:53	7:01	7:14	7:30	7:40	7:49	8:04	8:20
7:08	7:16	7:29	7:45	7:55	8:04	8:17	8:32
7:25	7:33	7:46	8:02	8:11	8:20	8:33	8:49
7:45	7:53	8:06	8:20	8:29	8:37	8:50	9:05

Current Metro schedules for Line 105:

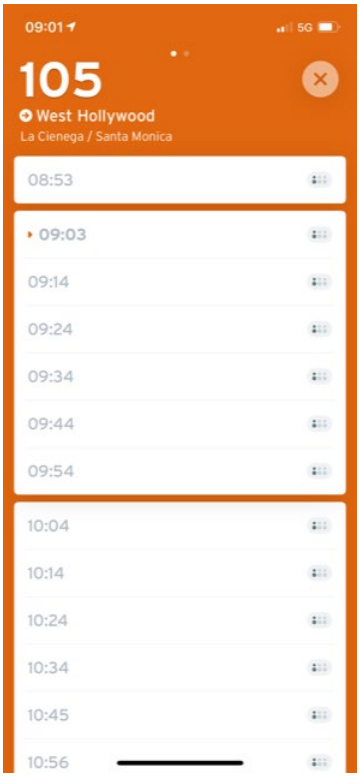


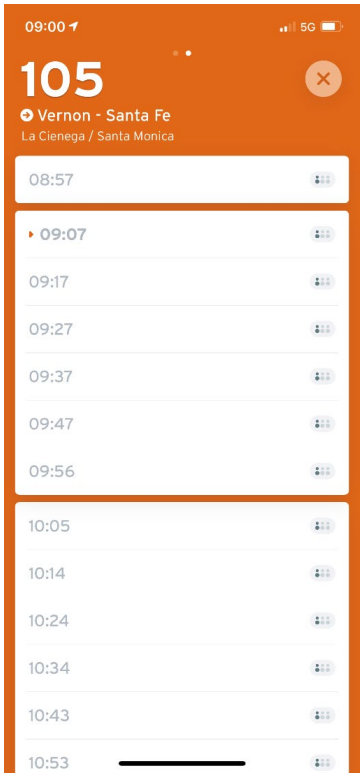
Monday through Friday — Effective Sep 12 2021 — **4**

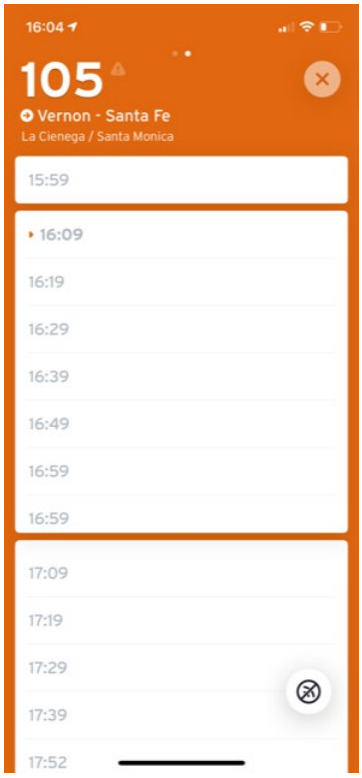
Eastbound *Al Este* (Approximate Times / *Tiempos Aproximados*) | **Westbound** *Al Oeste* (Approximate Times / *Tiempos Aproximados*)

SANTA MONICA	WEST LOS ANGELES	WEST HOLLYWOOD		LOS ANGELES		BEVERLY HILLS	LOS ANGELES	LOS ANGELES	BEVERLY HILLS	LOS ANGELES		WEST HOLLYWOOD		WEST LOS ANGELES	SANTA MONICA
Ocean & Arizona	Santa Monica & Westwood	Santa Monica & Sawtelle	Santa Monica & Fairfax	Santa Monica & Westmore	Santa Monica / Vermont Station	Santa Monica & Crescent	Venice & Broadway	Venice & Broadway	Santa Monica & Crescent	Santa Monica / Vermont Station	Santa Monica & Westmore	Santa Monica & Fairfax	Santa Monica & Sawtelle	Santa Monica & Westwood	Ocean & Arizona
4:27A	4:51A	5:08A	5:14A	5:27A	5:31A	5:41A	5:58A	6:04A	4:23A	4:39A	4:36A	4:47A	4:53A	5:01A	5:23A
4:58	5:14	5:29	5:35	5:46	5:53	6:03	6:22	6:03	4:53	5:09	5:02	5:13	5:19	5:31	5:49
5:13	5:31	5:44	5:50	6:03	6:08	6:19	6:39	6:14	5:11	5:21	5:25	5:37	5:43	5:56	6:14
5:23	5:42	5:55	6:01	6:15	6:21	6:32	6:53	5:12	5:29	5:39	5:44	5:56	6:02	6:17	6:35
5:35	5:54	6:07	6:13	6:27	6:33	6:45	7:06	5:26	5:44	5:54	5:59	6:13	6:19	6:34	6:53
5:47	6:06	6:19	6:25	6:39	6:45	6:57	7:18	5:36	5:54	6:04	6:09	6:23	6:29	6:45	7:04
5:58	6:18	6:31	6:37	6:51	6:57	7:09	7:30	5:45	6:03	6:14	6:19	6:33	6:39	6:55	7:14
—	6:25	6:38	6:44	6:58	7:04	7:16	7:37	5:54	6:12	6:23	6:28	6:42	6:48	7:05	—
6:12	6:32	6:45	6:51	7:06	7:12	7:24	7:44	6:01	6:19	6:30	6:34	6:50	6:56	7:12	7:31
—	6:38	6:51	6:57	7:13	7:19	7:31	7:51	6:07	6:25	6:37	6:43	6:57	7:04	7:21	—
6:25	6:45	6:58	7:05	7:21	7:27	7:40	8:03	6:15	6:33	6:45	6:51	7:05	7:12	7:28	7:48
—	6:52	7:05	7:12	7:28	7:34	7:47	8:10	6:22	6:40	6:52	6:58	7:13	7:20	7:37	—
6:38	6:59	7:13	7:20	7:36	7:42	7:55	8:18	6:29	6:48	7:00	7:06	7:21	7:28	7:46	8:06
—	7:05	7:19	7:26	7:43	7:49	8:02	8:25	6:36	6:55	7:07	7:13	7:28	7:35	7:53	—
6:51	7:13	7:27	7:34	7:51	7:57	8:11	8:34	6:44	7:03	7:15	7:21	7:36	7:43	8:01	8:21
—	7:20	7:34	7:41	7:58	8:04	8:18	8:41	6:50	7:10	7:22	7:28	7:43	7:50	8:09	—
7:05	7:27	7:42	7:49	8:06	8:12	8:26	8:49	6:58	7:18	7:30	7:36	7:51	7:58	8:17	8:37
—	7:33	7:48	7:55	8:13	8:19	8:33	8:56	7:04	7:24	7:37	7:43	7:58	8:06	8:25	—
7:18	7:41	7:56	8:03	8:21	8:27	8:41	9:04	7:12	7:32	7:45	7:51	8:07	8:15	8:34	8:56
—	7:48	8:03	8:10	8:28	8:34	8:48	9:11	7:19	7:39	7:52	7:58	8:15	8:23	8:42	—
7:32	7:56	8:11	8:18	8:36	8:42	8:56	9:19	7:27	7:47	8:00	8:06	8:23	8:31	8:50	9:12
—	8:03	8:18	8:25	8:43	8:49	9:03	9:26	7:34	7:54	8:07	8:13	8:30	8:39	8:58	—
7:47	8:11	8:26	8:33	8:51	8:57	9:12	9:35	7:41	8:01	8:15	8:21	8:38	8:47	9:06	9:28
—	8:18	8:33	8:40	8:58	9:04	9:19	9:42	7:47	8:08	8:22	8:28	8:46	8:55	9:14	—
8:02	8:26	8:41	8:48	9:06	9:12	9:27	9:50	7:55	8:16	8:30	8:36	8:54	9:03	9:22	9:45
—	8:33	8:48	8:55	9:13	9:19	9:34	9:56	8:02	8:23	8:37	8:43	9:01	9:10	9:29	—
8:17	8:41	8:56	9:03	9:21	9:27	9:42	10:04	8:10	8:31	8:45	8:51	9:09	9:18	9:37	10:01
—	8:48	9:03	9:10	9:28	9:34	9:49	10:11	8:17	8:38	8:52	8:58	9:16	9:25	9:44	—
8:30	8:55	9:11	9:18	9:36	9:42	9:57	10:19	8:24	8:45	8:59	9:04	9:24	9:33	9:52	10:18
—	9:01	9:17	9:24	9:43	9:49	10:04	10:26	8:31	8:52	9:06	9:13	9:31	9:40	9:59	—
8:44	9:09	9:25	9:32	9:51	9:57	10:12	10:34	8:38	8:59	9:14	9:21	9:40	9:49	10:08	10:34
—	9:15	9:31	9:39	9:58	10:04	10:19	10:41	8:45	9:06	9:21	9:28	9:48	9:57	10:16	—
8:57	9:23	9:39	9:47	10:06	10:12	10:27	10:49	8:53	9:14	9:29	9:36	9:56	10:05	10:24	10:50
—	9:30	9:46	9:54	10:13	10:19	10:34	10:56	8:59	9:21	9:36	9:43	10:03	10:12	10:31	—
9:12	9:38	9:54	10:02	10:21	10:27	10:43	11:05	9:07	9:29	9:44	9:51	10:11	10:20	10:39	11:06
—	9:43	9:59	10:09	10:28	10:35	10:51	11:14	9:14	9:36	9:51	9:58	10:18	10:27	10:47	—
9:26	9:51	10:07	10:17	10:36	10:43	10:59	11:22	9:23	9:44	9:59	10:06	10:26	10:34	10:56	11:23
—	9:57	10:13	10:23	10:43	10:50	11:06	11:29	9:30	9:51	10:06	10:13	10:33	10:41	11:03	—
9:39	10:05	10:21	10:31	10:51	10:58	11:14	11:37	9:38	9:59	10:14	10:21	10:41	10:51	11:11	11:39
—	10:12	10:28	10:38	10:58	11:05	11:21	11:44	9:45	10:06	10:21	10:28	10:48	10:58	11:18	—
9:54	10:20	10:36	10:46	11:06	11:13	11:29	11:52	9:53	10:14	10:29	10:36	10:56	11:06	11:26	11:54
—	10:25	10:42	10:52	11:13	11:20	11:36	11:59	9:59	10:21	10:36	10:43	11:03	11:13	11:34	—
10:07	10:33	10:50	11:00	11:21	11:28	11:45	12:08P	10:06	10:28	10:44	10:51	11:11	11:21	11:42	12:10P
—	10:40	10:57	11:07	11:28	11:35	11:52	12:15	10:13	10:35	10:51	10:58	11:18	11:28	11:50	—
10:22	10:48	11:05	11:15	11:36	11:43	11:59	12:22	10:21	10:43	10:59	11:06	11:26	11:36	11:57	12:26
—	10:55	11:12	11:22	11:43	11:50	12:07P	12:30	10:28	10:50	11:06	11:13	11:33	11:43	12:05P	—
10:37	11:03	11:20	11:30	11:51	11:58	12:15	12:38	10:35	10:57	11:14	11:21	11:42	11:52	12:13	12:42
—	11:10	11:27	11:37	11:58	12:05P	12:22	12:45	10:41	11:04	11:21	11:28	11:49	11:59	12:21	—
10:51	11:18	11:35	11:45	12:06P	12:13	12:30	12:53	10:48	11:11	11:28	11:36	11:57	12:08P	12:29	12:59
—	11:23	11:41	11:51	12:13	12:20	12:37	1:00	10:54	11:18	11:35	11:43	12:04P	12:15	12:37	—
11:03	11:31	11:49	11:59	12:21	12:28	12:45	1:08	11:00	11:25	11:43	11:51	12:12	12:23	12:44	1:15
—	11:37	11:55	12:04P	12:28	12:35	12:52	1:14	11:07	11:32	11:50	11:58	12:19	12:30	12:52	—
11:15	11:44	12:02P	12:14	12:36	12:43	1:00	1:22	11:15	11:40	11:58	12:04P	12:27	12:38	12:59	1:30
—	11:50	12:09	12:21	12:43	12:50	1:07	1:29	11:21	11:47	12:05P	12:13	12:34	12:45	1:07	—
11:27	11:57	12:17	12:29	12:51	12:58	1:15	1:37	11:28	11:55	12:13	12:21	12:42	12:53	1:14	1:45
—	12:04P	12:24	12:36	12:58	1:05	1:22	1:44	11:35	12:02P	12:20	12:28	12:49	1:00	1:22	—
11:42	12:12	12:32	12:44	1:06	1:13	1:30	1:52	11:43	12:10	12:28	12:36	12:57	1:08	1:29	2:00
—	12:19	12:39	12:51	1:13	1:20	1:37	1:59	11:50	12:17	12:35	12:43	1:04	1:15	1:37	—
11:57	12:27	12:47	12:59	1:21	1:28	1:45	2:07	11:58	12:25	12:43	12:51	1:12	1:23	1:44	2:15
—	12:34	12:54	1:06	1:28	1:35	1:52	2:14	12:05P	12:32	12:50	12:58	1:19	1:30	1:52	—
12:12P	12:42	1:02	1:14	1:36	1:43	2:00	2:22	12:13	12:40	12:58	1:06	1:27	1:38	1:59	2:30
—	12:48	1:08	1:20	1:43	1:50	2:07	2:29	12:20	12:47	1:05	1:13	1:34	1:45	2:07	—
12:26	12:56	1:16	1:28	1:51	1:58	2:15	2:37	12:28	12:55	1:13	1:21	1:42	1:53	2:15	2:46
—	1:03	1:23	1:35	1:58	2:05	2:22	2:45	12:35	1:02	1:20	1:28	1:49	2:00	2:23	—
12:41	1:11	1:31	1:43	2:06	2:13	2:30	2:53	12:43	1:10	1:28	1:36	1:57	2:07	2:29	3:00
—	1:18	1:38	1:50	2:13	2:20	2:37	3:00	12:50	1:17	1:35	1:43	2:04	2:14	2:37	—
12:54	1:25	1:44	1:58	2:21	2:28	2:44	3:09	12:58	1:25	1:43	1:51	2:12	2:22	2:44	3:16
—	1:32	1:53	2:05	2:28	2:35	2:53	3:16	1:05	1:32	1:50	1:58	2:19	2:29	2:52	—
1:09	1:40	2:01	2:13	2:36	2:43	3:01	3:24	1:13	1:40	1:58	2:06	2:27	2:37	2:59	3:30
—	1:47	2:08	2:20	2:43	2:50	3:08	3:31	1:20	1:47	2:05	2:13	2:34	2:44	3:07	—
1:24	1:55	2:16	2:28	2:51	2:58	3:16	3:39	1:28	1:55	2:13	2:21	2:42	2:52	3:14	3:45
—	2:02	2:23	2:35	2:58	3:05	3:23	3:46	1:35	2:02	2:20	2:28	2:49	2:59	3:22	—
1:39	2:10	2:31	2:43	3:06	3:13	3:31	3:54	1:43	2:10	2:28	2:36	2:57	3:07	3:29	4:00
—	2:16	2:37	2:49	3:13	3:20	3:38	4:01	1:50	2:17	2:35	2:43	3:04	3:14	3:37	—
1:52	2:24	2:45	2:57	3:21	3:28	3:46	4:09	1:57	2:25	2:43	2:51	3:12	3:22	3:44	4:15
—	2:31	2:52	3:04	3:28	3:35	3:53	4:16	2:04	2:32	2:50	2:58	3:19	3:29	3:52	—
2:06	2:39	3:00	3:12	3:36	3:43	4:01	4:24	2:12	2:40	2:58	3:06	3:27	3:37	3:59	4:29
—	2:46	3:07	3:19	3:43	3:50	4:08	4:31	2:19	2:47	3:05	3:13	3:34	3:44	4:07	—
2:21	2:54	3:15	3:27	3:51	3:58	4:16	4:38	2:27	2:55	3:13	3:21	3:42	3:52	4:14	4:44
—	3:01	3:22	3:34	3:58	4:05	4:23	4:45	2:34	3:02	3:20	3:28	3:49	3:59	4:22	—
2:36	3:09	3:30	3:42	4:06	4:13	4:31	4:53	2:42	3:10	3:28	3:36	3:57	4:07	4:29	4:59
—	3:15	3:36	3:48	4:13	4:20	4:38	5:00	2:50	3:17	3:35	3:43	4:04	4:14	4:37	—
2:49	3:22	3:44	3:56	4:21	4:28	4:46	5:08	2:59	3:25	3:43	3:51	4:11	4:21	4:43	5:11
—	3:29	3:51	4:03	4:28	4:35	4:53	5:15	3:06	3:32	3:50	3:58	4:18	4:28	4:52	—
3:05	3:38	4:00	4:11	4:36	4:43	5:01	5:23	3:14	3:40	3:58	4:06	4:26	4:36	4:57	5:26
—	3:45	4:07	4:18	4:43	4:50	5:08	5:30	3:21	3:47	4:05	4:13	4:33	4:43	5:07	—
3:20	3:53	4:15	4:26	4:51	4:58	5:16	5:38	3:29	3:55	4:13	4:21	4:41	4:51	5:12	5:41
—	4:00	4:22	4:33	4:58	5:05	5:23	5:45	3:36	4:02	4:20	4:28	4:48	4:58	5:22	—
3:35	4:08	4:30	4:41	5:06	5:13	5:31	5:53	3:44	4:10	4:28	4:36	4:56	5:06	5:27	5:56
—	4:16	4:38	4:49	5:13	5:20	5:38	6:00	3:51	4:17	4:35	4:43	5:03	5:13	5:37	—
3:51	4:23	4:45	4:57	5:21	5:28	5:46	6:08	3:59	4:25	4:43	4:51	5:11	5:21	5:41	6:08
—	4:30	4:53	5:04	5:28	5:35	5:53	6:14	4:06	4:32	4:50	4:58	5:18	5:28	5:48	6:15
4:06	4:38	5:01	5:12	5:36	5:43	6:01	6:22	4:14	4:40	4:58	5:06	5:26	5:36	5:56	6:22
—	4:44	5:08	5:19	5:43	5:50	6:08	6:29	4:21	4:47	5:05	5:13	5:33	5:43	6:06	—
4:20	4:52	5:16	5:27	5:51	5:58	6:15	6:36	4:30	4:56	5:13	5:21	5:40	5:50	6:10	6:36
—	4:58	5:23	5:34	5:58	6:05	6:22	6:42	4:37	5:03	5:20	5:28	5:47	5:57	6:20	—
4:34	5:06	5:31	5:42	6:06	6:13	6:30	6:50	4:46	5:12	5:29	5:36	5:55	6:05	6:24	6:49
—	5:14	5:38	5:49	6:13	6:20	6:37	6:57	4:54	5:19	5:36	5:43	6:02	6:12	6:31	—
4:51	5:22	5:46	5:57	6:21	6:28	6:44	7:04	5:02	5:27	5:44	5:51	6:10	6:20	6:39	7:04
—	5:30	5:53	6:04	6:28	6:35	6:51	7:10	5:10	5:34	5:51	5:58	6:17	6:27	6:47	—
5:08	5:38	6:01	6:12	6:36	6:43	6:59	7:18	5:18	5:42	5:59	6:06	6:25	6:35	6:53	7:18
—	5:45	6:08	6:19	6:43	6:50	7:06	7:25	5:25	5:49	6:06	6:13	6:32	6:42	7:00	7:25
5:24	5:53	6:16	6:27	6:51	6:58	7:14	7:33	5:34	5:58	6:14	6:21	6:39	6:49	7:07	7:32
—	6:00	6:23	6:34	6:58	7:04	7:20	7:39	5:41	6:05	6:21	6:28	6:46	6:56	7:14	—
5:40	6:08	6:31	6:42	7:06	7:12	7:28	7:47	5:49	6:13	6:29	6:36	6:54	7:04	7:21	7:46
5:52	6:20	6:42	6:53	7:16	7:22	7:38	7:57	5:56	6:20	6:36	6:43	7:01	7:10	7:28	—
6:02	6:30	6:52	7:03	7:26	7:32	7:47	8:06	6:04	6:28	6:44	6:51	7:09	7:18	7:35	8:00
6:14	6:42	7:04	7:14	7:36	7:42	7:57	8:16	6:11	6:35	6:51	6:58	7:16	7:25	7:43	—
6:26	6:54	7:15	7:25	7:46	7:52	8:07	8:26	6:19	6:43	6:59	7:06	7:24	7:33	7:49	8:13
6:37	7:04	7:25	7:35	7:56	8:02	8:16	8:35	6:30	6:53	7:09	7:16	7:34	7:43	7:59	8:22
6:49	7:15	7:36	7:46	8:06	8:11	8:25	8:44	6:40	7:03	7:19	7:26	7:44	7:53	8:09	8:32
7:02	7:27	7:47	7:57	8:16	8:21	8:35	8:54	6:51	7:14	7:30	7:36	7:54	8:03	8:19	8:42

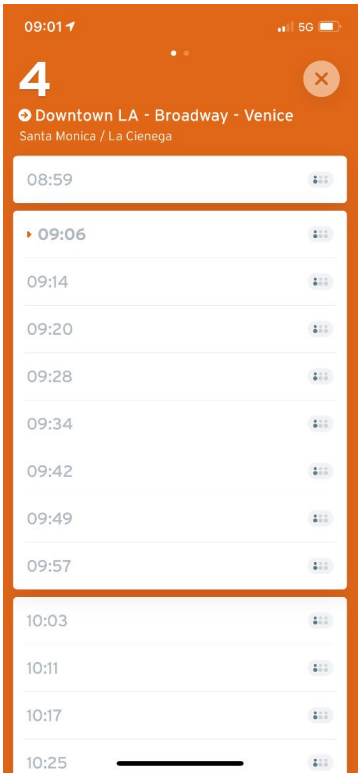
GTFS based real-time arrival predictions for Line 105 (AM and PM):

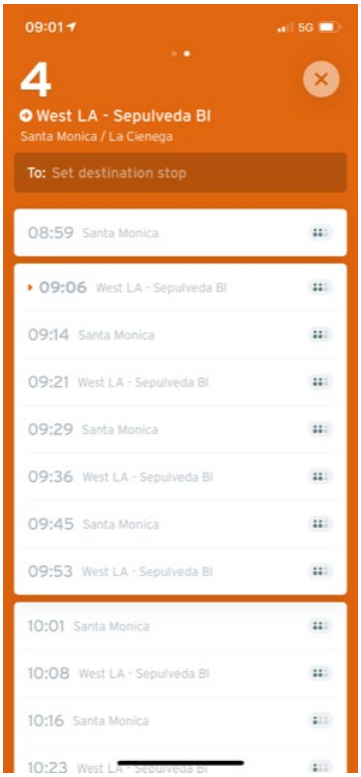


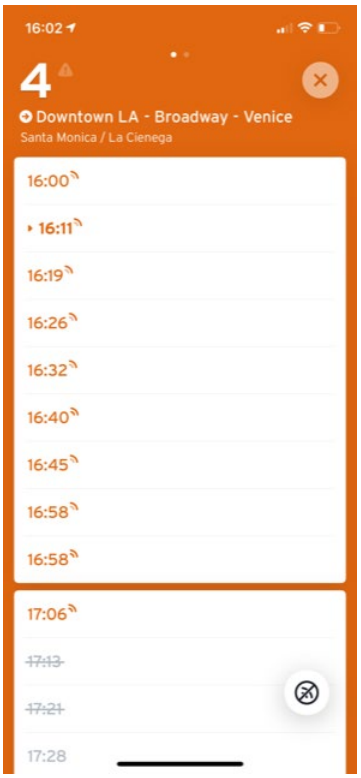


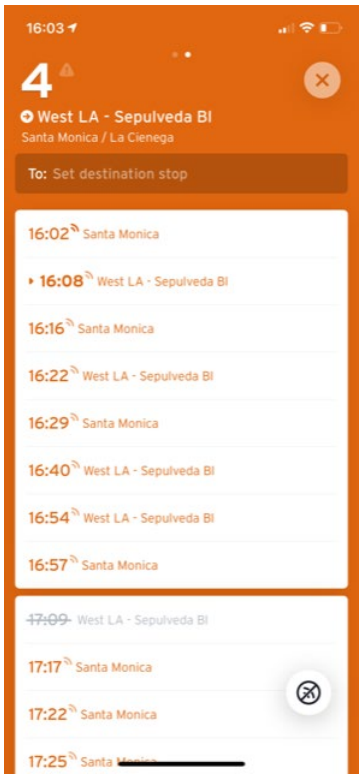


GTFS based real-time arrival predictions for Line 4 (AM and PM):









Response 29.8

The commenter asserts that the transportation baseline is deficient because the Recirculated Draft EIR lists as series of bus routes that are discontinued. The commenter also asserts that the Recirculated Draft EIR should not be presumed to have a less than significant VMT and aesthetics impact because it is not within a transit priority area.

Please see Response 29.7. The project site within a transit priority area and the presumed less than significant VMT and aesthetics findings are valid as explained in Section 1.0, *Introduction,* and Section 4.6, *Transportation,* of the Recirculated Draft EIR. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.9

The commenter again asserts that the proposed project should not be presumed to have less than significant VMT and aesthetics impacts because it is not within a transit priority area.

Please see Response 29.7. The project site within a transit priority area and the presumed less than significant VMT and aesthetics impact findings are valid as explained in Section 1.0, *Introduction,* and Section 4.6, *Transportation,* of the Recirculated Draft EIR. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.10

The commenter asserts that the Recirculated Draft EIR fails to analyze secondary parking impacts such as air quality, noise, safety and other transportation impacts.

As discussed in the project traffic study prepared by Fehr & Peers (appendix G of the Recirculated Draft EIR), the project provides 13 fewer spaces than what is required in Section 19.28.040 of the City's Municipal Code; however, the project is in a transit area and would provide 133 bicycle parking spaces where 39 are required. Lack of parking is not expected to create localized traffic or other impacts created by residents, employees, and patrons searching for available parking. It would be speculative to assume there would be secondary parking impacts. Further, as discussed throughout the Recirculated Draft EIR, the proposed project is a mixed-use project on an infill site. The project site is located in a "transit priority area" in proximity to several Metro bus lines. Due to the project's location, the project would be expected to encourage transit use and walking. As noted in the traffic study, "[b]y locating commercial uses on the first floor and partially on the second floor, the Project supports the Mobility Element goal to maintain and enhance a pedestrian- oriented city by activating the Project frontage along the sidewalk. By providing more bicycle parking spaces than required by City code, the Project supports the West Hollywood Pedestrian & Bicycle Mobility Plan goal to support multi-modal transportation options and improve the end-of-trip experience for bicyclists. The Project also supports the City's Climate Action Plan goal to increase pedestrian

mode share and to establish mixed-used, pedestrian, and transit-oriented development along commercial corridors and in Transit Overlay Zones as it proposes a mix of uses, with commercial uses on the ground floor, and is located in a Transit Overlay Zone along Santa Monica Boulevard." For these reasons, secondary air quality, noise, and safety impacts related to residents, patrons, and employees searching for parking are not anticipated. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.11

The commenter states that the Recirculated Draft EIR improperly labels mitigation measures as green building features.

As discussed in Section 2.0, *Project Description,* the proposed project includes green building features in order to conform with the City's Green Building Program. The proposed project does comply with the City's Green Building Program and as such would be eligible for a Green Building FAR bonus. These features are part of the project design in accordance with applicable regulations and standards and have been analyzed as part of the project in the Recirculated Draft EIR. These features are not "proposed action taken to mitigate any significant effect on the project ...." *Berkeley Hillside Preservation v. City of Berkeley*, 241 Cal. App. 4th 943, 961 (2015) (holding that implementation of a traffic plan did not amount to a mitigation measure); *see also Save the Plastic Bag Coalition v. City and County of San Francisco*, 222 Cal. App. 4th 863, 882-883 (2013) (holding that the implementation of a 10-cent plastic bag fee was done pursuant to a city ordinance to address a problem that existed before the project); *Wollmer v. City of Berkeley*, 193 Cal. App. 4th 1329, 1352 (2011) (holding that the dedication of a public right-of-way was a component of a project that helped alleviate an existing traffic issue, not a mitigation measure). Therefore, they are not mitigation measures as claimed by the commenter.

Response 29.12

The commenter claims that the Recirculated Draft EIR's Mitigation Measure GS-1 is deferral because it fails to commit to a specific performance standard. The commenter also states that professional protocols should be integrated into other mitigation measures besides GS-1 such as CR-1 and that the EIR should be modified to require that mitigation and monitoring efforts comply with national and state guidelines.

The commenter begins by providing the commenter's interpretation of CEQA requirements regarding deferral of mitigation measures. The commenter notes impermissible deferral of mitigation occurs when an EIR calls for mitigation measures to be created based on future studies, but the agency fails to commit itself to specific performance standards. What the commenter failed to note, however, is that a lead agency may rely on future studies to devise the specific design of a mitigation measure when the results of later studies are used to tailor mitigation measures to fit on-the-ground environmental conditions. See *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal.App.4th 362, 411 (upholding mitigation measure, based on further investigation of contamination at project site, calling for development of hazardous materials remediation plan); *City of Hayward v. Board of Trustees of Cal. State Univ.* (2015) 242

Cal.App.4th 833, 855 (upholding transportation demand management program that identified measures to be evaluated and included monitoring plan, performance goals, and schedule for implementation). Mitigation performance standards are sufficient if they identify the criteria the agency will apply in determining that the impact will be mitigated. *Citizens for a Sustainable Treasure Island v. City & County of San Francisco* (2014) 227 Cal.App.4th 1036, 1059.

The commenter does not provide the complete citation or summary of Mitigation Measure GS-1. Mitigation Measure GS-1 properly relies on the results of the monitoring set forth in the measure to tailor future plans to the on-the-ground conditions. Specifically, if a paleontological resource is discovered, the monitor shall have the authority to temporarily divert construction equipment around the find until it is assessed for scientific significance and collected. Mitigation Measure GS-1 also includes specific performance standards. As stated in the measure, if significant resources are found, they should be "prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection." This is a performance standard for managing potential significant paleontological resources that may be found. No paleontological resources have been found at this time. In response to this comment to clarify what meets the definition of a qualified paleontologist, this information has been added to Mitigation Measure GS-1 "A qualified professional paleontologist is defined by the Society of Vertebrate Paleontology (SVP) standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years." This change has been made in the Executive Summary of the FEIR and in the Initial Study included as Appendix A in the FEIR. No changes have been made to Mitigation Measure CR-1 which includes an explanation of the definition of a qualified archaeologist as one who meets the Secretary of the Interior's Professional Qualification Standards.

Response 29.13

The commenter provides background context on the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the requirement under CEQA Guidelines Section 15125(d) for an EIR to evaluate inconsistencies between the proposed project and regional transportation plans.

This comment provides an explanation of the RTP/SCS and raises no issues with respect to the Recirculated Draft EIR.

Response 29.14

The commenter states that the Recirculated Draft EIR does not provide a sufficient analysis or discussion of the project's consistency with the latest iteration of SCAG's RTP/SCS (Connect SoCal) and asserts that a statement included on page 3 of Appendix G of the Recirculated Draft EIR is conclusory in nature. The commenter states the Program EIRs for SCAG's 2012 and 2016 RTP/SCS plans include project-level environmental mitigation measures that should be implemented when local municipalities are identifying and mitigating project-specific environmental impacts.

The statement on page 3 of Appendix G of the Recirculated Draft EIR referred to by the commenter is contained in the Transportation Technical Memorandum and is part of this

report's discussion of whether the project qualifies for the Office of Planning and Research's VMT screening criterion for projects located in a High Quality Transit Area. This statement is not intended to serve as the Recirculated Draft EIR's analysis of the project's consistency with Connect SoCal. Contrary to the commenter's assertion, the Recirculated Draft EIR includes a detailed analysis of the project's consistency with Connect SoCal on pages 4.3-20 and 4.3-21 in Section 4.3, *Greenhouse Gas Emissions*, of the Recirculated Draft EIR. The discussion adequately provides an analytic bridge between the evidence and the findings that the proposed project would be consistent with the strategies and actions of Connect SoCal.

As stated in the commenter's letter, SCAG adopted Connect SoCal in September 2020. This plan supersedes the 2012 and 2016 RTP/SCS plans; therefore, the older version of the RTP/SCS no longer applies and the commenter's references to these plans are outdated. Regardless, the City is not required by CEQA to impose mitigation measures identified in the Program EIR for Connect SoCal because the Recirculated Draft EIR is not tiering from the RTP/SCS's Program EIR or streamlining the project's environmental review pursuant to Senate Bills 375, 743, or 226. As stated on page 1.0-18 of the Final PEIR for Connect SoCal, "For projects proposing to streamline environmental review pursuant to SB [Senate Bill] 375, SB 743, or SB 226, or for projects otherwise tiering off this PEIR [Program EIR], the project-level mitigation measures described in this PEIR (or comparable measures) can and should be considered and implemented by lead agencies (and project sponsors) during the subsequent, project- or site-specific environmental reviews for transportation and development projects as applicable and feasible. However, SCAG cannot require lead agencies to adopt mitigation and it is ultimately the responsibility of the lead agency to determine and adopt project-specific mitigation as appropriate and feasible for each project."[3] As such, the recommendation that lead agencies "can and should" consider and implement the mitigation measures identified in the Program EIR for Connect SoCal is only applicable to projects proposing to streamline environmental review pursuant to Senate Bills 375, 743, or 226, or for projects otherwise tiering off the Program EIR for Connect SoCal. Furthermore, as concluded in Section 4.3, *Greenhouse Gas Emissions*, of the Recirculated Draft EIR, the project would not result in significant GHG emissions impacts. Therefore, no measures are necessary to mitigate project impacts related to GHG emissions. This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response 29.15

The commenter states that the Recirculated Draft EIR incorrectly relies upon plan-level goals contained in the SCAG RTP/SCS. The commenter asserts that the Recirculated Draft EIR does not demonstrate consistency with the RTP/SCS's project-level goals and that the Recirculated Draft EIR should be revised to indicate the specific project-level mitigation measures that would be implemented to demonstrate consistency with the SCAG RTP/SCS.

The "goals" listed by the commenter are generally adapted from the narrative of SCAG's 2016 RTP/SCS and the mitigation measures contained in the Program EIR for SCAG's 2012 RTP/SCS. As stated in the commenter's letter, SCAG adopted Connect SoCal in September

[3] *SCAG. 2020. Certified Final Program Environmental Impact Report. (SCH#20199011061). May 2020. Available at: https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocal_complete.pdf?1607981618*

2020. This plan supersedes the 2012 and 2016 RTP/SCS plans; therefore, the older versions of the RTP/SCS no longer apply and the commenter's references to these plans are outdated. In addition, as detailed under Response 8.14, the City is not required by CEQA to impose mitigation measures identified in the Program EIR for Connect SoCal because the Recirculated Draft EIR is not tiering from the RTP/SCS's Program EIR or streamlining the project's environmental review pursuant to Senate Bills 375, 743, or 226. Furthermore, the commenter's list of project-level goals is their own compilation of what they perceive to be the project-level goals of SCAG's RTP/SCS and are not contained in the 2012 RTP/SCS, 2016 RTP/SCS, or Connect SoCal. There is no requirement under CEQA to analyze the project's consistency with this list of goals provided by the commenter because they are not part of a current adopted regional plan.

Furthermore, Table 4.3-5 in Section 4.3, *Greenhouse Gas Emissions*, does not evaluate the project's consistency with the plan-level goals of Connect SoCal,[4] as the commenter asserts, but rather analyzes project consistency with the specific land use strategies and actions contained in Connect SoCal that are applicable on a project-level basis. Furthermore, as concluded in Section 4.3, *Greenhouse Gas Emissions*, of the Recirculated Draft EIR, the project would not result in significant GHG emissions impacts. Therefore, no measures are necessary to mitigate project impacts related to GHG emissions. Furthermore, as discussed throughout the Recirculated Draft EIR, the project would not result in significant impacts related to land use and planning, hydrology and water quality, transportation and circulation, and utilities and service systems; therefore, no mitigation measures are necessary to mitigate project impacts related to these resource categories. Nonetheless, several of the measures recommended by the commenter are already being implemented by the project including:

- The proposed project is located within walking distance of retail facilities, restaurants, and public transportation.
- The proposed project includes bicycle parking for residents, employees and customers
- The proposed project would exceed California Building Code Energy Efficiency Standards by 15%.
- In order to reduce energy use, the proposed project would include a rooftop solar photovoltaic system which would offset a portion of the building's energy use with renewable energy. The solar panels are estimated to generate at least 87,000 kilowatt-hours of electricity per year.
- The proposed project would include Energy Star appliances, lighting, and signage.
- The proposed project would also include programmable thermostats and ceiling fans in residential units.
- The proposed project would include recycled-content materials in the foundation, insulation, and landscaping. The interior spaces would use materials composed of recycled content or rapidly renewable and sustainably harvested resources.
- In order to reduce water use, the proposed project would, install low-flow showerheads, tankless water heaters and water-efficient toilets and faucets.
- The proposed project would include drought-tolerant, climate appropriate landscaping to reduce the amount of irrigation needed.

[4] *Connect SoCal 2024 – The 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy prepared SCAG is available online at https://scag.ca.gov/connect-socal*

- The proposed project would involve bio-treatment best management practices (BMPs) in order to meet the City's Low Impact Development (LID) requirements. The proposed project includes raised planters and landscaped areas (mentioned previously) that would be designed to treat storm water runoff. Stormwater runoff from upper floors would be diverted to the second-floor and third-floor planters and the landscaped area in the northern part of the project site and along West Knoll Drive for filtration

In addition, Mitigation Measure GEO-3(a) and GEO-3(b) are designed to reduce water quality impacts in the unlikely event dewatering is required.

Response 29.16

The commenter concludes by stating that the City should revise and recirculate the Recirculated Draft EIR and states the City should contact the commenter if there are any questions or concerns on their comments.

Please refer to Responses 29.1 through 29.15. As discussed therein, no significant environmental impacts warranting recirculation of the Recirculated Draft EIR have been identified.

Response to Attachment A

Please see Response to Attachment A of Letter 18.

Response to Attachment B

The commenter includes as an attachment the resume of air quality and GHG expert Paul E. Rosenfeld.

This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response to Attachment C

The commenter includes as an attachment the resume of air quality and GHG expert Matt Hagemann.

This comment does not affect the analysis completed or conclusions provided in the Recirculated Draft EIR, does not provide new information or evidence related to the analysis completed in the Recirculated Draft EIR, and does not reflect on the adequacy or content of the Recirculated Draft EIR. No changes to the Recirculated Draft EIR are required.

Response to Attachment D

The commenter includes an attachment which is a 2010 paper authored by the Society of Vertebrate Paleontology entitled "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" in support of the commenter's assertion that professional protocols should be integrated into other mitigation measures besides GS-1 such as

CR-1 and that the EIR should be modified to require that mitigation and monitoring efforts comply with national and state guidelines.

The commenter's Attachment D generally relates to, but is not tailored to, this project or the Recirculated Draft EIR. As such, the City is not required to provide a response to this attachment. *Environmental Protection Information Center v. California Dept. of Forestry & Fire Protection*, 44 Cal. 4th 459, 483-484 (2008) (holding that an agency has no duty to consider all non-project-specific secondary materials submitted in support of the comments). Nonetheless, the City hereby provides a response to this attachment as it relates to the comment letter.

Attachment D provides suggested procedures for the mitigation of adverse impacts to paleontological resources. The commenter includes Attachment D as support for the commenter's assertions that mitigation measure GS-1 must be modified to meet the requirements for a "qualified professional paleontologist" and that the mitigation measure should at minimum meet the requirements of all procedures set forth in the Attachment. The contention regarding a "qualified professional paleontologist" has already been addressed in Response 29.12.

With respect to the Attachment D's procedures for the mitigation of adverse impacts, such procedures will be considered by the "qualified professional paleontologist" if relevant and appropriate. Provisions regarding paleontological resources are set forth in federal, state, and local regulations, but Attachment D does not appear to be a formally adopted policy by government agencies. Nonetheless GS-1 is consistent with the procedures set forth in the 2010 paper. The 2010 paper refers to "pre-project survey and salvage, monitoring and screen washing during excavation to salvage fossils, conservation and inventory, and final reports and specimen curation." GS-1 requires full-time monitoring for all excavations in certain undisturbed areas, with the authority to temporarily divert construction to assess a find's scientific significance. GS-1 also requires that any significant salvaged fossils are to be prepared to a curation-ready condition and curated in a scientific institution with permanent collection. Finally, GS-1 requires the preparation of a report regarding the entire process. A report will be prepared by a "qualified professional paleontologist" that is in accordance with all applicable laws, rules, and standards as appropriate. See also Caltrans Guidance for Compliance, which, while not directly related to the project, provides extensive and detailed standards for paleontological impact mitigation. The paleontological resources monitoring complies with these standards. https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-8-paleontology#id.

Response to Attachment E

The commenter incudes an attachment entitled "Los Angeles County Metropolitan Transportation Authority, Maps and Schedules, accessed November 29, 2021."

The commenter's Attachment E is intended to support his assertion that, as of November 29, 2021, Metro Rapid Lines 705 and 705 are no longer in service but provides no additional suggestions or considerations. As such, please see Response 29.7.

8.1 Comments and Responses – Public Hearing Comments

Verbal comments received at the Transportation Commission hearing on November 17, 2021 from members of the public and Transportation Commissioners are summarized below.

- **Comment:** Several commenters raised concerns about traffic congestion on Santa Monica Boulevard and surrounding roadways.
  - **Response:** Please see Response 8.1.
- **Comment:** A commenter stated opinions about the design and aesthetics of the proposed project.
  - **Response:** Please see Response 6.1.
- **Comment:** Several commenters stated opinions about parking for the project, both that parking shouldn't be required and that the project should have more parking to avoid visitors and residents parking on adjacent streets.
  - **Response.** Please see Response 29.10.

Verbal comments received at the Planning Commission hearing on November 18, 2021 from members of the public and Planning Commissioners are summarized below.

- **Comment:** Several commenters stated opinions on the project, either support or opposition.
  - **Response:** The commenter's opinions are noted, but do not pertain to the Recirculated Draft EIR.
- **Comment:** Several commenters stated concerns about traffic congestion on Santa Monica Boulevard and on West Knoll Drive and issues related to driveway congestion and queuing on Santa Monica Boulevard.
  - **Response:** Please see Response 8.1.
- **Comment:** A commenter provided similar comments as raised in Letters 18 and 29 related to the suggestion that the City should require utilization of local trained and skilled workforce to reduce construction-related environmental impacts and that the project is not within a transit priority area.
  - **Response:** Please see Response 18.2.
- **Comment:** Several commenters raised concerns about how project operation and construction would affect the neighborhood.
  - **Response:** Issues with respect to neighborhood compatibility insofar as they related to physical impacts on the environment (such as those related to air quality, noise, etc.) are analyzed throughout the Recirculated Draft EIR. Impacts were found to be less than significant or less than significant with mitigation except for construction noise impacts which were found to be significant and unavoidable. With respect to traffic congestion, please see Response 8.1.
- **Comment:** Several commenters stated concerns about issues related to hydrology and geology, such as issues related to the water table, liquefaction, the sufficiency of the geotechnical analysis, and issues related to the proposed retaining wall.
  - **Response:** Please see responses 9.1, 10.4, 12.9, 17.1, and the responses to Letter 21.

- **Comment:** A commenter raised a concern about the accuracy of the shadow analysis.
  - **Response:** Please see Response 6.1.
- **Comment:** A commenter asked about the project height and how the height was calculated.
  - **Response:** As discussed in Section 2.0, *Project Description,* of the Recirculated Draft EIR, the project height is measured as provided by Section 19.20.080.B.2 of the WHMC. The proposed mixed-use structure at the north side facing West Knoll would be 55 feet in height measured from the ground surface at the property line. At the south side of the structure facing Santa Monica Boulevard, the height of the building would be approximately 48 feet from the ground surface to the top of the third floor. At the front of the building facing Santa Monica Boulevard, the building would have 5 stories above ground, and the fourth floor would be set back approximately 8 feet from the façade.
- **Comment:** A commenter stated disagreement with the sentence in the Recirculated Draft EIR Project Description stating "primary commercial access is from Santa Monica Boulevard" since all commercial access is from Santa Monica Boulevard.
  - **Response:** In response to this comment, changes have been made to page ES-3 in the Executive Summary and Page 2-14 in Section 2.0, *Project Description,* of the Final EIR to clarify that "Commercial access to the project site would be from Santa Monica Boulevard."
- **Comment:** A commenter stated that Figure 2-2 in the Recirculated Draft EIR is outdated because it doesn't show the new commercial development across the street.
  - **Response:** In response to this comment, Figure 2-2 in Section 2.0, *Project Description,* has been updated in the Final EIR.
- **Comment:** A commenter stated that the Recirculated Draft EIR does not mention natural gas and asks if natural gas is part of the project.
  - **Response:** In response to this comment, information was added on page 2-16 in Section 2.0, *Project Description,* of the Final EIR to clarify that natural gas service would be provided by Southern California Gas Company.
- **Comment:** A commenter asked how the proposed parking for the alternatives were prepared.
  - **Response:** The parking assumptions for the alternatives were calculated by assuming the proposed uses associated with each alternative would provide parking in accordance with City parking requirements.
- **Comment:** A commenter stated that on Page 6-18, Table 6-12 of Section 6.0, *Alternatives,* the heights for CC1 and R4B should be flipped.
  - **Response:** The commenter is correct. An error on Table 6-12 has been corrected in the Final EIR.
- **Comment:** A commenter stated support for a sound barrier to address construction noise.
  - **Response:** Please see Response 28.10.
- **Comment:** A commenter raised the same concerns as raised in Letter 25.
  - **Response:** Please see the responses to Letter 25.