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December 3, 2024

VIA EMAIL

Chair Lee and Honorable Members of the Planning
and Land Use Management Committee
Los Angeles City Council
City of Los Angeles
200 N. Spring Street, Room 395
Los Angeles, CA 90012

**Re: Sunset & Everett Project; Applicant Response to December 2, 2024 SAFER Letter
Council File 24-1054; Case Nos. CPC-2023-5528-DB-SPR-MCUP-HCA & ENV-2023-5529-SCEA**

Dear Chair Lee and Honorable PLUM Committee Members:

This firm represents Aragon (Sunset/Everett) Properties Corporation ("Applicant") in conjunction with its proposal to construct a new mixed-use development containing 327 residential dwelling units, inclusive of 41 Very Low Income affordable units, and approximately 9,462 square feet of commercial uses ("Project") on a 2.46-acre site located at the intersection of Sunset Boulevard and Everett Street ("Site"). On August 15, 2024, the City Planning Commission ("CPC") granted approval of the Project, including the Project's Sustainable Communities Environmental Assessment ("SCEA") that was prepared in compliance with the California Environmental Quality Act ("CEQA"). On August 27, 2024, the Supporters Alliance for Environmental Responsibility ("SAFER") and its law firm of Lozeau Drury filed an appeal of the CPC's determination to the Los Angeles City Council ("Appeal"). However, as described below, the Appeal consists entirely of prior objections to the Project made by SAFER that have all been fully responded to and rebutted with substantial evidence, which the CPC considered before granting approval of the Project

Specifically, prior to the CPC's approval of the Project, SAFER submitted a comment letter dated April 15, 2024 containing various objections to the Project's SCEA ("April 15 SAFER Letter"). On June 11, 2024, CAJA Environmental Services, the Applicant's expert CEQA consultant, submitted a comprehensive set of responses to the April 15 SAFER Letter ("June 11 Response Letter," see [Attachment 1](#)). On July 8, 2024, SAFER submitted a second letter that reiterated the objections contained in the April 15 SAFER Letter, without providing any new arguments or evidence to support those objections ("July 8 SAFER Letter"). On July 10, 2024, this firm submitted a letter to the CPC responding to each repeated objection in the July 8 SAFER Letter and identifying the substantial evidence existing in the record demonstrating that SAFER's objections have no merit ("July 10 Response Letter," see [Attachment 2](#)). On July 11, 2024, after consideration of all of the evidence in the record, including both letters responding to SAFER's objections, the CPC granted approval of the Project and its SCEA.

SAFER subsequently filed the Appeal that the PLUM Committee will consider today. However, as described in the appeal response prepared by the Department of City Planning and provided to the PLUM Committee ("City Appeal Response"), the Appeal consists entirely of prior objections to the Project made by SAFER that have all been fully responded to and rebutted with substantial evidence, which the CPC considered before granting approval of the Project.

Yesterday, SAFER submitted another letter regarding the Project and the SCEA ("December 2 SAFER Letter"); yet once again, the exact same objections are made, notwithstanding the voluminous evidence in the record demonstrating that SAFER's objections have no merit. For purposes of completeness of the record, responses to the December 2 SAFER Letter are provided below.

December 2 SAFER Letter Claim: The Project is not eligible to utilize a SCEA because it is allegedly inconsistent with the City's General Plan due to its utilization of State density bonus law and associated incentives and waivers.

Response: As described in Response to SAFER Comment 3 of the June 11 Response Letter, as well as the response to Appeal Point 1 in the City Appeal Response, to utilize a SCEA, the Project must be consistent with the Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS") prepared by the Southern California Association of Governments ("SCAG"). General Plan consistency is not a required criterion under the SCEA statute (Public Resources Code Section 21155(a)).

As set forth by the SCEA and supported by substantial evidence, the Project is fully consistent with the general use designation, density, building intensity, and applicable policies of the RTP/SCS. Moreover, although not required as a criterion for utilization of a SCEA, the Project is also consistent with the applicable General Plan regulations for the Site, as utilization of State density bonus law does not result in any inconsistency with applicable General Plan or zoning regulations pursuant to Government Code Sections 65915(f)(5) and 65915(j)(1). Therefore, this claim by SAFER has no merit.

December 2 SAFER Letter Claim: The Project is inconsistent with SCAG's RTP/SCS because it does not implement all feasible mitigation measures and performance standards identified in the RTP/SCS.

Response: As described in Responses to SAFER Comments 4 through 9 of the June 11 Response Letter, as well as the response to Appeal Point 2 in the City Appeal Response, nothing in the SCEA statute or applicable case law requires the Project to implement every single policy and/or mitigation measure discussed by the RTP/SCS. First, as a general precept of CEQA, mitigation is only required for potentially significant environmental effects. Specifically, mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines Sections 15126.4(3)). Furthermore, a lead agency only has authority to require mitigation to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law and relevant CEQA guidance (CEQA Guidelines Section 15041).

Furthermore, as specifically set forth in SCAG's RTP/SCS program EIR, nothing in the program EIR is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the

Program EIR, as appropriate, to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

Pursuant to these requirements, for the SCEA, the City properly assessed each environmental impact topic to determine if the Project had the potential to result in a significant environmental effect. Next, the City properly assessed each potentially applicable mitigation measure and identified appropriate mitigation when required by CEQA (i.e., when the potential existed for a significant effect to occur), which may include a SCAG RTP/SCS mitigation measure, or a measure of equal or greater effectiveness. Accordingly, contrary to SAFER's claim, implementation of an RTP/SCS mitigation measure, even if arguably "feasible" to implement, is not necessary if there is no potential for an environmental effect to occur.

December 2 SAFER Letter Claim: The Project will result in impacts to biological resources that are not properly analyzed in the SCEA.

Response: As described in Responses to SAFER Comments 10, 14, and 15 of the June 11 Response Letter and the response to Appeal Point 3 in the City Appeal Response, and as further confirmed by the supplemental technical report prepared by South Environmental (included as Exhibit C of the June 11 Response Letter), the SCEA properly concluded that the Site does not contain occupied habitat, potentially suitable habitat, or designated critical habitat, nor does such habitat exist in the vicinity of the Site, and therefore, the Project would not adversely affect wildlife connectivity. Furthermore, these responses specifically rebut SAFER's claims that multiple special status species were observed or would be observed at the Site, by describing the flawed methodology SAFER utilized to identify the "predicted" number of special status species that may exist by relying on biological observations conducted over 300 miles away from the urbanized location of the Site in an area of annual grasslands. In addition, South Environmental's responses demonstrate that, contrary to SAFER's claims, the Project and its surrounding landscaping would not pose a substantial risk of bird strikes. Accordingly, the SCEA properly analyzed potential impacts to biological resources, and additional mitigation measures are not warranted.

The Appeal provides no new arguments and simply states: "For the specific reasons set forth in the attached comment letters dated April 15, 2024 and July 8, 2024, the SCEA fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts." However, as described above in summary and in detail by Attachments 1 and 2, SAFER's objections regarding the Project and the SCEA are not supported by substantial evidence and do not demonstrate any deficiency in the SCEA's environmental review of the Project. Accordingly, the Appeal should be dismissed.

Thank you for your consideration of this information, and please do not hesitate to contact us with any questions.

Chair Lee and Honorable PLUM Committee Members

December 3, 2024

Page 4

Sincerely,



Todd Nelson

Partner

of RAND PASTER & NELSON, LLP

cc: Esther Ahn, Department of City Planning
Heather Bleemers, Department of City Planning

Attachments

- Attachment 1: June 11, 2024 letter from CAJA Environmental Services
- Attachment 2: July 10, 2024 letter from Rand Paster & Nelson

Attachment 1



9410 Topanga Canyon Boulevard, Suite 101, Chatsworth, CA 91311
Phone 310-469-6700

June 11, 2024

Los Angeles Department of City Planning
Esther Ahn, City Planner, esther.ahn@lacity.org

Responses to Comments re: Sunset and Everett Project (Project)

We write in response to the comment letters received on the Sunset and Everett Project (CPC-2023-5528-DB-SPR-HCA-MCUB and ENV-2023-5529-SCEA), which includes a Sustainable Communities Environmental Assessment (SCEA) pursuant to the California Environmental Quality Act (CEQA).

The Project Site is located on the east side of Sunset Boulevard, north of Everett Street, in the Silver Lake-Echo Park-Elysian Valley Community Plan area of the City of Los Angeles. The Site is currently vacant. The Applicant proposes the development of a mixed-use project comprised of two buildings with 327 residential units, including 41 Very Low Income affordable units, and approximately 9,462 square feet of ground-floor commercial space. The Project's two buildings contain a total of 321,300 square feet of floor area.

A hearing for the Project was conducted on April 16, 2024, and the following Comment Letters were received in connection with the Project:

- Lozeau Drury Law Firm representing the Supporters Alliance for Environmental Responsibility (SAFER), dated April 15, 2024
- Shalane Miller, April 16, 2024
- Matt Morello, April 16, 2024
- Evan Whale, April 18, 2024
- Clay Bush, April 24, 2024

Responses to the Comment Letters are provided below. The individual comments within the Comment Letters will be identified as **Comment "X"**. The individual responses will be identified as **Response to Comment "X"**.

These Responses include the following Exhibits:

- A** Health Risk Assessment Evaluation, Air Quality Dynamics, May 20, 2024
- B** Signal Warrant Analysis, Fehr & Peers, May 2024
- C** Biological Responses to Comments, South Environmental, June 4, 2024

SAFER

April 15, 2024

SAFER Comment 1

This comment is submitted on behalf of Supporters Alliance for Environmental Responsibility (“SAFER”) regarding the Sustainable Communities Environmental Assessment (“SCEA”) prepared for the Sunset and Everett Project (ENV-2023-5529-SCEA) (“Project”), which proposes construction of two 7 story mixed-use residential and commercial buildings with a total of 327 residential units and 263 on-site parking spaces: one subterranean, one partially subterranean, and one at-ground and above-grade level on a vacant asphalted parcel located at 1185 Sunset Boulevard; 1185, 1187, 1193, 1195, 1197, 1201, 1205, 1207, 1211, 1215, 1221, 1225, 1229, 1233, 1239, 1243, 1245, 1247 W. Sunset Boulevard and 917 N. Everett Street in the City of Los Angeles.

SAFER is concerned that the SCEA fails to adequately analyze the Project’s potentially significant environmental impacts, and fails to impose all feasible mitigation measures to reduce the Project’s impacts. SAFER requests the Planning Development Department prepare an environmental impact report (“EIR”) for the Project rather than a SCEA.

SAFER reserves the right to supplement these comments throughout the administrative process. Galante Vineyards v. Monterey Peninsula Water Management Dist., 60 Cal. App. 4th 1109, 1121 (1997).

Response to SAFER Comment 1

The comment is an introduction and summary of the Project and introduces the claims of the comment letter.

As set forth in the responses below, as well as additional responses and evidence contained in the administrative record such as the SCEA and its Appendices, the Project will not result in potential impacts, including but not limited to potential air quality and health risk impacts or biological impacts. The SCEA complied with CEQA, conducted a project-level analysis, and included mitigation measures as appropriate.

The comment does not state a specific concern or question regarding the adequacy of the City’s determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm’n* (2011) 202 Cal.App.4th 549.)

SAFER Comment 2

I. LEGAL BACKGROUND

Sustainable Communities Environmental Assessment under SB 375.

CEQA allows for the streamlining of environmental review for “transit priority projects” meeting certain criteria. Pub. Res. Code §§ 21155, 21155.1, 21155.2. To qualify as a transit priority project, a project must

(1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

(2) provide a minimum net density of at least 20 dwelling units per acre; and

(3) be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

Pub. Res. Code § 21155(b). A transit priority project is eligible for CEQA's streamlining provisions where,

[The project] is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board . . . has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction targets.

Pub. Res. Code § 21155(a). In 2020, the Regional Council for the Southern California Association of Governments ("SCAG") formally adopted the Connect SoCal 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy ("2020 RTP/SCS"), which was accepted by CARB on October 30, 2020.

If "all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081" are applied to a transit priority project, the project is eligible to conduct environmental review using a sustainable communities environmental assessment ("SCEA"). Pub. Res. Code § 21155.2. A SCEA must contain an initial study which "identif[ies] all significant or potentially significant impacts of the transit priority project . . . based on substantial evidence in light of the whole record." Pub. Res. Code § 21155.2(b)(1). The initial study must also "identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports." *Id.* The SCEA must then "contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study." Pub. Res. Code § 21155(b)(2). The SCEA is not required to discuss growth inducing impacts or any project specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network. Pub. Res. Code § 21159.28(a).

After circulating the SCEA for public review and considering all comments, a lead agency may approve the SCEA with findings that all potentially significant impacts have been identified and mitigated to a less-than-significant level. Pub. Res. Code § 21155(b)(3), (b)(4), (b)(5). A lead agency's approval of a SCEA must be supported by substantial evidence. Pub. Res. Code § 21155(b)(7).

Response to SAFER Comment 2

The comment summarizes the legal background regarding CEQA and the preparation of a SCEA.

The comment does not state a specific concern or question regarding the adequacy of the SCEA in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

SAFER Comment 3

II. DISCUSSION

A. The City May Not Rely on the SCEA Because the Project is Not Consistent with the General Plan.

The City may only rely on a SCEA if [The project] is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area. Pub. Res. Code § 21155(a).

The Project is not consistent with the general plan density and building intensity. The zoning allows a floor area ratio (FAR) of 1.5:1. However the Project has a FAR of 3:1 – double the FAR allowed by the zoning. (SCEA p. 3-12).

The zoning allows a maximum building height of 57-feet. The Project is proposed to be 91-feet in height. (SCEA p. 2-13).

Since the Project is not consistent with the General Plan and zoning, the City may not rely on a SCEA.

Response to SAFER Comment 3

The commenter misconstrues the qualifying criteria for the use of a SCEA. To rely on a SCEA, a project must be consistent with the general use designation, density, building intensity, and applicable policies of SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), not the policies and standards of the City's General Plan and zoning regulations. Thus, a project need not be consistent with the City's General Plan and/or zoning designations in order to rely on a SCEA. Nonetheless, the Project is consistent with the City's General Plan and zoning designations, except to the extent permitted by the State Density Bonus Law, in addition to being consistent with the 2020-2045 RTP/SCS.

First, the SCEA provides substantial evidence that the Project is consistent with the general use designation, density, building intensity of the 2020-2045 RTP/SCS. See Section 2.1 of the SCEA. The core vision of the 2020-2045 RTP/SCS is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS focuses on transportation infrastructure and existing job centers in order to determine where future growth of employment and households would likely occur. Priority Growth Areas (PGAs) have been identified in the region where growth is forecasted to occur due to proximity to existing and planned transit, existing job centers, existing and planned infrastructure to support more walkability and use of alternative transportation modes, and in areas identified for jurisdictional expansion (i.e., spheres of influence). These PGAs include Transit Priority Areas, High Quality Transit Areas, Job Centers, Livable Corridors, and Neighborhood Mobility Areas. Collectively, these PGAs are anticipated to contain 95 percent of the growth in the region through the horizon year of 2045. The City evaluates consistency with the 2020-2045 RTP/SCS by looking at a Project's ability to meet policies related to the identified PGAs. The Project Site is located within and advances the policy considerations behind multiple identified PGAs.

- The Project Site is located adjacent to the Downtown Los Angeles Job Center.
- The Project Site is located within a Transit Priority Area due to its proximity to the intersection of intersection of Sunset Boulevard/Cesar Chavez Avenue and Figueroa Street, 2,075 feet southeast of the Site, which is served by Metro bus lines 4, 55, and 60. These lines have headways of 15 minutes or less during peak hours.

- The Project Site is located within a High-Quality Transit Area due to its proximity to the intersection of Sunset Boulevard which has transit routes with a 15 minute or less service frequency during peak commute hours.
- The Project Site is located within a mapped Neighborhood Mobility Area.
- The nearest Livable Corridor to the Project Site is Sunset Boulevard, located adjacent west of the Project Site.

The SCEA explains how the Project's location, scale, and mixture of land uses would be consistent with its designation within these PGAs, which, in turn, indicates consistency with the use designations, density, and buildings intensity of the 2020-2045 RTP/SCS. Table 4-1 and Table 4-2 of the SCEA provides detailed analysis about how the Project is consistent with the applicable goals and guiding principles and strategies, respectively, of SCAG's 2020-2045 RTP/SCS.

Therefore, the SCEA demonstrates that the Project is consistent with the general use designation, density, building intensity, and applicable policies of SCAG's 2020-2045 RTP/SCS.

Further, although not a prerequisite for reliance on a SCEA, the Project is consistent with the City's General Plan and zoning designations. The Project is not requesting a General Plan Amendment or a zone change. The Project's consistency with the applicable goals, objectives and policies of the General Plan Framework Element is demonstrated in Table 5.11-2 of the SCEA. The Project's consistency with the other General Plan elements is provided on pages 5-199 to 5-204 of the SCEA. The Project's consistency with the Silver Lake-Echo Park-Elysian Valley Community Plan is demonstrated in Table 5.11-4 of the SCEA. Finally, the SCEA also describes how the Project is consistent with the existing C2-1VL zoning designation, except to the extent permitted by the State Density Bonus Law, which supersedes local zoning regulations. Specifically, benefits earned under the State Density Bonus Law do not create inconsistencies with local general plan and zoning regulations (see Gov. Code Sections 65915(f)(5) and 65915(j)(1)).

The Project is eligible to receive up to three density bonus incentives/concessions. The Project is requesting an on-menu density bonus incentive (per LAMC Section 12.22.A.25(f)(4)(ii)) to allow an increase in the FAR to 3.0:1. This on-menu incentive is available to projects in commercial zones in Height District 1 (including 1VL) that front on a Major Highway, contain sufficient affordable units to qualify for a 35% density bonus, and are located within 1,500 feet of a Metro Rapid Bus Stop. The Project meets each of these criteria. The Project is also seeking an on-menu incentive to permit a thirty percent reduction in open space and an off-menu incentive to allow increased building height, as described in the entitlement application case materials. Each of these requests is properly made under State Density Bonus Law, and therefore do not result in any inconsistencies with the General Plan or zoning designation for the site.

SAFER Comment 4

B. The City May Not Rely on the SCEA Because the Project is Inconsistent with the SCS.

If "all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081" are applied to a transit priority project, the project is eligible to conduct environmental review using a sustainable community environmental assessment ("SCEA"). Pub. Res. Code § 21155.2.

The Project fails to implement mitigation measures and performance standards required by the Sustainable Communities Strategy (SCS).

Response to SAFER Comment 4

The comment claims the Project does not comply with the SCS. As discussed in Table 4-1 and Table 4-2 of the SCEA, the Project would be consistent with the applicable goals and guiding principles and strategies, respectively, of SCAG's 2020-2045 RTP/SCS. The Mitigation Monitoring and Reporting Program for the 2020-2045 RTP/SCS Program EIR (SCAG MMRP) includes programmatic mitigation measures to be implemented by SCAG and project-level mitigation measures that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

First, mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines Sections 15126.4(3)). A lead agency only has authority to require mitigation to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law¹ (CEQA Guidelines Section 15041). A discussion of the City's significance determination for each impact area is found in Section 5 of the SCEA, which includes a determination for each impact area of whether mitigation may be applicable.

Second, the lead agency, not SCAG, has sole authority to impose mitigation measures on individual projects. Accordingly, for projects seeking to use a SCEA, the City determines which project-level mitigation measures included in the SCAG MMRP (or comparable measures) should be required by the local lead agency as appropriate and feasible. Many lead agencies have existing regulations, policies, and/or standard conditions of approval that address potential impacts. Nothing in the SCAG Program EIR is intended to supersede existing regulations and policies of individual jurisdictions. Since SCAG has no authority to impose mitigation measures, mitigation measures to be implemented by local jurisdictions are subject to a lead agency's independent discretion as to whether measures are applicable to projects in their respective jurisdictions. Lead agencies may use, amend, or not use measures identified in the Program EIR, as appropriate, to address project-specific conditions. The determination of significance and identification of appropriate mitigation is solely the responsibility of the lead agency.

To comply with PRC Section 21151.2, the City of Los Angeles (City) has reviewed all mitigation measures contained in the SCAG MMRP and determined their applicability to the Project. For each such mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG's Program EIR or whether an equally effective existing City mitigation measure, standard condition of approval, or other City regulation or federal, state, or regional regulation would supersede SCAG's mitigation measures. A discussion of the City's applicability determination for the measures contained in the SCAG MMRP is found in Section 6 of the SCEA.

Finally, the SCEA is subject to the deferential substantial evidence standard, not the fair argument standard (Pub Res Code Section 21155.2(b)(1) and (7)). Analysis contained in Sections 5 and 6 of the SCEA provides substantial evidence supporting the City's conclusions. Thus, the City is under no obligation under CEQA to accept any particular environmental impact mitigation measures suggested by third parties.²

1 *(Nollan v. California Coastal Commission (1987) 483 U.S. 825, Dolan v. City of Tigard (1994) 512 U.S. 374, Ehrlich v. City of Culver City, (1996) 12 Cal. 4th 854, emphasis added.)*

2 *A Local & Regional Monitor (ALARM) v. City of Los Angeles (1993) 12 Cal.App.4th 1773, 1809.*

SAFER Comment 5

SCS Goal 5 is to reduce greenhouse gases (GHGs) and improve Air Quality. (SCEA p. 4-20). The SCS requires projects to promote low emission technologies such as electric vehicles (eVs). (SCEA p. 4-19). The SCS requires projects to include solar energy and power storage. (SCEA p. 4-20).

Response to SAFER Comment 5

As described in **Response to SAFER Comment 4** and in the SCEA itself, the Project would be consistent with the applicable goals and guiding principles and strategies, respectively, of SCAG's 2020-2045 RTP/SCS. A project is considered consistent with the provisions and general policies of applicable City or regional land use plans and regulations if it is consistent with the overall intent of the plan or regulation and would not preclude the attainment of its primary goals. More specifically, according to the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.^{4th} 704, 719, state law does not require an exact match between a project and the applicable plan. Rather, to be "consistent," the project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning that a project must be in "agreement or harmony" with the applicable land use plan to be consistent with that plan.

As specifically described in the SCEA (Table 4-1), the Project is consistent with SCS Goal 5 regarding reductions in GHG emissions and improvement of air quality; as also set forth in the SCEA, the Project's potential GHG and air quality impacts would be less than significant. Specifically, the Project Site's location near robust transit opportunities (high frequency bus service along Sunset Boulevard) would further reduce dependence on automobile travel, reducing VMT and associated pollutant emissions.

Furthermore, the Project is consistent with the 2020-2045 RTP/SCS's strategy and measure regarding the promotion of low-emission technologies by, among other things, providing parking spaces with electric vehicle (EV) charging equipment; Table 3-10 of the SCEA summarizes the amount of EV spaces provided by the Project. Of the Project's 263 vehicle parking spaces, the Project will provide 172 EV spaces (79 will be EV capable, 66 will be EV chargers, and 27 will be EV ready). See **Response to SAFER Comment 7** for further discussion of this topic.

Regarding solar energy and power storage, as described in Table 4-1 of the SCEA, the SCS does not mandate that individual projects provide solar energy and power storage; the measure referenced by the commenter is applicable to public agencies and recommends that policies be developed to support the incorporation of micro-power grids in communities. Notwithstanding the inapplicability of this measure to individual development projects, the Project will provide solar ready roofs per current Title 24 and Energy Code requirements, unless exempt due to the implementation of other identified GHG emission reduction measures (e.g., smart thermostats and Energy Star rated dishwashers and refrigerators in every unit). See **Response to SAFER Comment 6** for further discussion of this topic.

SAFER Comment 6

Solar Panels: Despite these requirements, the Project includes only a "solar-ready" roof. This means that the roof can support solar photo-voltaic panels, but no such panels will necessarily be installed. Installing solar panels is clearly feasible, and so should be required for the Project to be consistent with the SCS.

Response to SAFER Comment 6

As described in **Response to SAFER Comment 5**, contrary to the commenter's assertion, the 2020-2045 RTP/SCS does not include any requirement for individual projects to include solar photo-voltaic panels. The measure the commenter is apparently referencing encourages public agencies to identify ways to incorporate "micro-power grids" in communities, and the potential incorporation of solar energy into such micro-power grids is identified by the same measure. In no way can this recommended policy measure be understood to mandate the installation of solar panels at the Project.

Notwithstanding the inapplicability of this measure to the Project, the Project will fully comply with all applicable Title 24 and Energy Code requirements regarding energy conservation and efficiency, including the provision of solar-ready roofs, as described in the SCEA. Moreover, as also described in the SCEA, the Project will not result in any potentially significant impacts regarding GHG emissions, air quality, or energy consumption, such that additional measures or project features would be necessary to reduce or eliminate an impact. Furthermore, this comment is unsubstantiated opinion and discusses potential economic impacts regarding the alleged feasibility of installing solar panels. The commenter does not provide substantial evidence that the Project, with or without solar panels, would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

SAFER Comment 7

EV Charging: Despite the above policies in the SCS, the Project only includes the bare minimum 10% electric vehicle charging. (SCEA p. 3-17). While additional parking spaces are EV-ready, they will not be equipped with EV charging stations. 100% EV charging is feasible and should be required. Not only would this comply with SCS Goal 5, but also SCS Goal 8: Leverage new transportation technologies. (SCEA p. 4-19).

Response to SAFER Comment 7

As described in **Response to SAFER Comment 5**, the Project is consistent with the 2020-2045 RTP/SCS's strategy and measure regarding the promotion of low-emission technologies, including the provision of EV parking spaces. Pursuant to LAMC Section 99.04.106.4.2.2 and as noted on page 3-17 of the SCEA, the Project will provide 172 EV spaces (79 will be EV capable, 66 will be EV chargers, and 27 will be EV ready).

The comment claims that it would be feasible to provide all parking spaces as EV spaces and therefore this should be required for the Project, but does not provide any evidence of the Project's currently proposed EV spaces being in conflict with the RTP/SCS. The Project complies with the required provision of spaces for each type of EV category. There is no justification to exceed what is required.

The comment also does not state the full text of SCS Goal 8, which is to "Leverage new transportation technologies and data-driven solutions that result in more efficient travel." [underline added for emphasis]. By not including the full text, the comment evades what is applicable to the Project. This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system. The Project is a mixed-use infill development located within an existing circulation system and will provide EV spaces and bicycle parking spaces in compliance with applicable

requirements and in alignment with SCAG's mobility and GHG reduction goals. The Project does not and cannot individually leverage new transportation technologies or data-driven solutions to result in more efficient travel.

The comment is unsubstantiated opinion and discusses potential economic impacts regarding the alleged feasibility of installing additional EV charging infrastructure. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

SAFER Comment 8

Battery Storage: Despite the above SCS policies, the Project does not appear to include any battery storage. The SCS requires solar energy and power storage. (SCEA p. 4-20). Battery storage is feasible and should be included in the Project along with solar PV.

Response to SAFER Comment 8

As described in **Response to SAFER Comment 5** and **Response to SAFER Comment 6**, contrary to the commenter's assertion, the 2020-2045 RTP/SCS does not include any requirement for individual projects to include power storage or battery storage. The measure the commenter is apparently referencing encourages public agencies to identify ways to incorporate "micro-power grids" in communities, and the potential utilization of power storage into such micro-power grids is identified by the same measure. This measure is directed toward public agencies as a policy strategy and does not apply to individual projects. In no way can this recommended policy measure be understood to mandate the installation of battery power storage at the Project.

The comment is unsubstantiated opinion and discusses potential economic impacts regarding the alleged feasibility of providing battery power storage. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

SAFER Comment 9

Heat Island: The SCS requires projects to reduce the heat island effect. (SCEA p. 4-21). The Project does not include standard measures to reduce heat island, such as low albedo roofs and parking areas. Such measures are feasible and should be included in the Project.

Response to SAFER Comment 9

As described in Table 4-1 of the SCEA, the measure referenced by the commenter is directed towards SCAG as a policy measure, and does not apply to individual projects. Specifically, this measure calls upon SCAG to support the development of local climate adaptation and hazard mitigation plans; in no way can

this measure be understood to require individual projects to independently address climate resiliency on a jurisdiction-wide basis.

Notwithstanding the inapplicability of this measure, the Project would not conflict with its goals. The Project would include extensive landscaping and incorporates parking areas within the building footprint, thereby reducing the potential for unshaded surface parking areas to contribute to an urban heat island effect. The Project will also comply with Los Angeles Green Building Code requirement that roofing material used in residential buildings meet certain values for the aged solar reflectance thermal emittance, and Solar Reflectance Index.³

The comment claims measures to reduce the urban heat island effect are feasible but does not identify such measures or explain how the cost is feasible. The comment is unsubstantiated opinion and discusses potential economic impacts regarding the alleged feasibility of incorporating additional project design characteristics. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

SAFER Comment 10

Wildlife Connectivity: The SCS requires projects to preserve and enhance wildlife connectivity. (SCEA p. 4-21). The SCEA contends that this goal is not relevant because the Project is located in an urban area. This is simply untrue. The Project site is a vacant parcel in an urban area. As discussed by wildlife biologist, Dr. Shawn Smallwood, Ph.D., such parcels are critical to wildlife connectivity, particularly for avian (bird) species. The few bits of open space in urban areas provide important resting and stopover habitat for avian species. the SCEA fails to analyze this impact at all. Dr. Smallwood concludes that the Project would adversely affect wildlife connectivity. Thus, the Project does not “preserve and enhance” wildlife connectivity, and is inconsistent with the SCS.

Response to SAFER Comment 10

As noted on page 5-67 of the SCEA, due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. However, birds protected by the Migratory Bird Treaty Act may nest within the trees that would be removed as part of the Project.

Notwithstanding the fact that that the SCEA adequately discussed potential biological impacts in Section 5, part 1.4, included Mitigation Measure MM-Bio-1 to ensure potential construction-related impacts on nesting birds, and provided references to applicable regulatory compliance, a technical response to this comment has been prepared by South Environmental, which is included as **Exhibit C** to this Response (Biological Responses to Comments, South Environmental, June 4, 2024).

3 LADBS and LADWP, Cool Roofs: <https://www.ladbs.org/docs/default-source/publications/ordinances/cool-roof-fact-sheet-and-faq.pdf?sfvrsn=10>

As noted in the SCEA on pages 5-66 to 5-70, and further discussed by South Environmental, the site lacks any wetlands or streams or other water features, it is set in a densely urbanized area with no connectivity to any open space or native habitats, and the lot has been previously developed for decades until recently.

The nearest substantial open space would be within Griffith Park approximately 3-miles from the Project site. The areas between the Project site and Griffith Park are densely urbanized. The site is surrounded by urbanization in all directions and has no direct or indirect connection to habitat areas and provides no linkage opportunities or opportunities for wildlife to move through the urbanized area. There are no significant migratory stopover locations on the site or in the surrounding areas, and following the Project development there would be no reason for migrating birds to attempt to stop anywhere near the site. Migrating wildlife would not be found at the site due to urbanization and wildlife would typically avoid this area due to the potential hazards from cars and people. Therefore, the Project would not create any barriers or deterrents to migrating or moving wildlife. The area is already well lit and entirely developed and light would not spill onto any open space or native habitats. The Project would have no interference with wildlife movement as the area lacks movement corridors and dense urban development is not considered a wildlife movement corridor.

Therefore, the Project would not adversely affect wildlife connectivity and the analysis and conclusion in the SCEA remains valid.

SAFER Comment 11

C. The City May Not Rely on the SCEA Because the Project has Significant Impacts Unique to the Project and Not Addressed in the SCS.

1. Project-Level CEQA Review is Required for Impacts that were not Mitigated to Insignificance in the SCS EIR.

The SCEA must “contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.” Pub. Res. Code §21155(b)(2). Thus, to the extent that the SCS EIR admitted significant unmitigated impacts, further project-level CEQA review is required to analyze and mitigate those impacts on a project level because these impacts were not “mitigated to a level of insignificance” in the Connect SoCal EIR.

In the case of Communities for a Better Environment v. Cal. Resources Agency (2002) 103 Cal.App.4th 98, 122-125, the court of appeal held that when a “first tier” EIR admits a significant, unavoidable environmental impact, then the agency must prepare second tier EIRs for later phases of the project to ensure that those unmitigated impacts are “mitigated or avoided.” (Id. citing CEQA Guidelines §15152(f)) The court reasoned that the unmitigated impacts were not “adequately addressed” in the first tier EIR since they were not “mitigated or avoided.” (Id.) Thus, significant effects disclosed in first tier EIRs will trigger second tier EIRs unless such effects have been “adequately addressed,” in a way that ensures the effects will be “mitigated or avoided.” (Id.) Such a second tier EIR is required, even if the impact still cannot be fully mitigated and a statement of overriding considerations will be required. The court explained, “The requirement of a statement of overriding considerations is central to CEQA’s role as a public accountability statute; it requires public officials, in approving environmental detrimental projects, to justify their decisions based on counterbalancing social, economic or other benefits, and to point to substantial evidence in support.” (Id. at 124-125)

The EIR for the SCS admitted significant and unavoidable impacts in several areas, including:

Aesthetic (Connect SoCal Draft PEIR, p. 2.0-18);

Agricultural Resources (Id., p. 2.0-20);

Air Quality (Id. p. 2.0-23);

Biological Resources (Id. p. 2.0-25);

Cultural Resources (Id. p. 2.0-34);

Geology and Soils (Id. p. 2.0-37);

Greenhouse Gases (Id. p. 2.0-40);

Hazards and Hazardous Materials (Id. p. 2.0-43);

Hydrology and Water Quality (Id. p. 2.0-49);

Land Use (Id. p. 2.0-52);

Mineral Resources (Id. p. 2.0-54);

Noise (Id. p. 2.0-55);

Population and Housing (Id. p. 2.0-58);

Fire Services (Id. p. 2.0-59);

Police Services (Id. p. 2.0-60);

Schools (Id. p. 2.0-61);

Library Services (Id. p. 2.0-61);

Recreation (Id. p. 2.0-61);

Transportation, Traffic and Safety (Id. p. 2.0-63);

Tribal Cultural Resources (Id. p. 2.0-66);

Solid Waste (Id. p. 2.0-67);

Wastewater (Id. p. 2.0-68);

Water Supply (Id. p. 2.0-69);

Wildfire (Id. p. 2.0-70);

CEQA review is required to analyze and mitigate the above impacts at the project level because they were not mitigated to a level of insignificance in the Connect SoCal EIR.

Response to SAFER Comment 11

The commenter cites to a case involving a challenge to the California Resources Agency's adoption of CEQA Guidelines Section 15152, which regards tiering from a Program EIR. A SCEA is governed by Public Resources Code Sections 21155 and 21155.2 and is an independent streamlining mechanism unrelated to the tiering provisions of Section 15152. Accordingly, the cited case is inapplicable and irrelevant to the SCEA. Nonetheless, as part of Section 5 of the SCEA, a project-level CEQA review was conducted for each of the environmental topic areas identified by Appendix G of the CEQA Guidelines. This analysis was based on the building plans, applicant input, project-level air quality, GHG, noise, and traffic modeling, and other relevant technical reports. All these inputs were included and disclosed as part of the SCEA. All impacts were found to be less than significant with mitigation measures applied to biological impacts for migratory birds, hazards due to contaminated soils with a soils management plan, noise impacts during construction, and tribal cultural resources for their inadvertent discovery.

SAFER Comment 12

2. Substantial Evidence Shows that the Project Will Likely Have Significant Air Quality Impacts.

Air quality experts Matt Hagemann, P.G., C.Hg. and Dr. Paul E. Rosenfeld, Ph.D. of the environmental consulting firm SWAPE reviewed the SCEA and concluded that the Project will likely have significant air quality impacts due to diesel particulate matter (DPM) emissions. SWAPE's comments and expert CVs are attached as Exhibit A. As discussed above, the SCS EIR did not mitigate air quality impacts to less than significant levels, therefore project-specific CEQA review is required.

Response to SAFER Comment 12

The SCEA includes a project-level air quality technical analysis that is fully compliant with CEQA in its focus on regional and localized impacts from emissions of criteria pollutants and other relevant air quality concerns, including potential emissions of TACs related to outdoor air quality. The Project's air quality analysis, contained in Section 5 and Appendix B of the SCEA, provides substantial evidence that the Project would result in less than significant air quality impacts. The scope of the analysis is appropriate in light of CEQA's general focus on projects' potential impacts on the human environment in general and not future project users.⁴

See **Response to SAFER Comment 13** for specific responses to the commenter's claims.

SAFER Comment 13

The SCEA fails to address potential health-related impacts resulting from the Project's likely air emissions. This is problematic because operation of construction equipment during construction of the proposed Project, as well as daily truck trips during future operations, will release diesel particulate matter ("DPM") emissions into the air, affecting local and regional air quality. DPM is a known human carcinogen which poses unique health risks to nearby sensitive receptors. Importantly, CEQA requires a quantified analysis to determine whether a Project's toxic air contaminant ("TAC") emissions—including DPM emissions—will have potentially adverse impacts on human health. Sierra Club v. County of Fresno (2018) 6 Cal. 5th 502,

⁴ California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369, 377 ("In light of CEQA's text, statutory structure, and purpose, we conclude that agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents.")

518 (an EIR must make “a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.”)

Current guidance by the Office of Environmental Health Hazard Assessment (“OEHHA”), the agency responsible for setting statewide standards to measure health risks under CEQA, recommends that a quantified Health Risk Assessment (“HRA”) be prepared to evaluate potential cancer risks for any short-term construction project lasting more than two months, and for the lifetime of any long-term project lasting more than six months. OEHHA guidance also recommends that an exposure duration of 30 years should be used to estimate the individual cancer risk affecting the maximally exposed individual resident (“MEIR”) near a proposed Project site. (Id., p. 7.) A project’s creation of health risks for impacted MEIRs must be further evaluated according to various sensitive receptors’ age and pregnancy status. (Id., p. 11.)

Construction of the proposed Project is expected to last 30 months, and it is reasonable to assume, in the absence of any contrary assertion by the SCEA, that future building operations will continue for at least 30 years, during which time there will be ongoing emissions from delivery trucks, passenger vehicles, water heaters, cooking appliances and other sources. (SWAPE, p. 3).

Contrary to this established regulatory framework, however, the SCEA failed to prepare a quantified HRA for the Project’s planned construction and operations. The SCEA also improperly relied on South Coast Air Quality Management District’s (“SCAQMD”) localized significance thresholds (“LSTs”) to evaluate the Project’s construction-related health risk impacts. This approach is incorrect, however, because LSTs only evaluate emissions of criteria air pollutants—NOx, CO, PM10, and PM2.5—but do not measure the effect of TAC emissions, including DPM emissions, upon sensitive receptors. (Id., p. 2.) As such, the SCEA fails to present substantial evidence showing that the Project will not have a significant health impact. The SCEA additionally “fails to compare the Project’s excess cancer risk” as it compares to the South Coast Air Quality Management District’s (“SCAQMD”) established significance threshold of 10 per million. (Id., p. 2.)

DPM has been listed as a known human carcinogen by the California Office of Health Hazard Assessment (“OEHHA”). DPM contains 40 toxic chemicals, including benzene, arsenic and lead. (www.p65warnings.ca.gov/fact-sheets/diesel-engine-exhaust.) DPM is listed separately by the State of California as a toxic air contaminant known to cause cancer in humans. (<https://oehha.ca.gov/media/downloads/proposition-65/p65chemicalslistsinglelisttable2021p.pdf>.)

According to the U.S. Environmental Protection Agency, “Exposure to diesel exhaust can lead to serious health conditions like asthma and respiratory illnesses and can worsen existing heart and lung disease, especially in children and the elderly. These conditions can result in increased numbers of emergency room visits, hospital admissions, absences from work and school, and premature deaths.” (<https://www.epa.gov/dera/learn-about-impacts-diesel-exhaust-and-diesel-emissionsreduction-act-dera>).

As explained above, the SCEA used LSTs to evaluate the Project’s construction-related health risk impacts. However, LSTs analyze only criteria air pollutants, not toxic air contaminants (TACs). Although LSTs analyze localized impacts of PM-10 and PM-2.5, there is no LST for DPM – the pollutant that forms the basis of SWAPE’s analysis. Although PM-2.5 is a constituent of DPM, it is only one of 40 toxic chemicals in DPM. PM-2.5 itself is not listed by the State as a cancer-causing chemical.

Therefore, SWAPE found that the SCEA’s evaluation of the Project’s potential health risk impacts, as well its conclusion that the Project will have a less-than-significant air quality impact conclusion, are methodologically flawed and are thus not supported by substantial evidence. (Id., p. 2.) As such, the City must prepare a revised SCEA or conduct an initial study to more accurately characterize the significance

of the Project's impacts. Unless and until the City can present substantial evidence showing that the Project's impacts are less than significant, the use of a SCEA is improper. Pub. Res. Code §21155(b)(1)-(2).

SWAPE conducted a screening-level risk assessment using AERSCREEN, a modeling tool which is recommended by both OEHHA and the California Air Pollution Control Officers Association ("CAPCOA") for the development of Level 2 Health Risk Screening Assessments ("Level 2 HRSA"). According to SWAPE, "A Level 2 HRSA utilizes a limited amount of site-specific information to generate maximum reasonable downwind concentrations of air contaminants to which nearby sensitive receptors may be exposed. If an unacceptable air quality hazard is determined to be possible using AERSCREEN, a more refined modeling approach is required prior to approval of the Project." (Id., pp. 3-4.)

Following this recommended approach for modeling potential future health risks, SWAPE presented substantial evidence showing that Project construction and operations would result in excess cancer risks for pregnant individuals during the third trimester of pregnancy, as well as for infants, children, and adults when those individuals are maximally exposed to Project-related emissions, or located approximately 75 meters from the Project site. (Id., p. 5.) SWAPE calculates that the excess cancer risks for the 3rd trimester of pregnancy, infants, children, and adults at the MEIR located approximately 75 meters away, over the course of Project construction and operation, are approximately 18.0, 388, 25.5, and 2.83 in one million, respectively. The excess cancer risk over the course of a residential lifetime (30 years) is approximately 434 in one million. The 3rd trimester, infant, child, and lifetime cancer risks exceed the SCAQMD threshold of 10 in one million, resulting in a potentially significant impact not previously addressed or identified by the SCEA. (Id. p. 7).

Therefore, SWAPE concludes that the "screening-level HRA demonstrates that construction and operation of the Project could result in a potentially significant health risk impact," and as such, "a revised SCEA should be prepared to include a refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation." (Id., p. 8.) SWAPE proposes numerous mitigation measures to reduce the Project's DPM impacts, which should be considered in a project-level EIR. (Id. pp. 8-11).

Response to SAFER Comment 13

The comment alleges that the Project will result in significant health risk impacts due to exposure from diesel particulate matter (DPM) during the Project's construction activities and requests a Health Risk Assessment (HRA) for the Project. The commenter's consultant SWAPE also prepared a "preliminary HRA" which claims that cancer risk estimates for adjoining residents exceed the maximum incremental cancer risk of 10 in one million established by SCAQMD for projects prepared under CEQA. As a result, SWAPE contends that a "potentially significant health risk impact" exists whereby "a refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation" be prepared.

The commenter's claim that an HRA was required here by any applicable regulation is false. The Department of City Planning relies on methodologies established by the regional expert air quality agency, the South Coast Air Quality Management District (SCAQMD) for preparation of CEQA air quality analyses. SCAQMD published the CEQA Air Quality Handbook in November 1993 to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects proposed in the region. The SCAQMD CEQA Handbook does not recommend analysis of toxic air contaminants (TACs) from short-term construction activities.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses.

The SCAQMD recommends HRAs for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

The Office of Environmental Health Hazards Assessment (OEHHA) requirements under AB 2588, the Air Toxic Hot Spots Program only applies to “facilities” as defined in Health and Safety Code Section 44322(a), which the state has determined applies to industrial facilities requiring operational air permits that use, manufacture, formulate, or release certain listed hazardous substances. Covered facilities do not include residential or mixed-use residential developments, which are not regulated under the Toxic Hot Spots Program. Notably, the OEHHA Guidelines assess cancer risks over 30-year exposures, they do not mandate analysis for “short-term” projects even under the Toxic Hot Spots Program, and thus the OEHHA Guidelines do not apply here, where the only DPM emissions would occur during a few months of construction activities as part of the Project.

Rather, as stated at pages 8-17 and 8-18 of the OEHHA Guidelines, the information regarding “short term” cancer exposures is provided to assist local air districts when they make permitting decisions for projects requiring AQMD permits related to shorter-term exposures, noting also that “there is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime.”

As indicated above, with respect to requiring quantitative HRAs related to DPM emissions from mobile sources – which describes the pollutant and type of source at issue here – SCAQMD only requires quantitative HRAs to be prepared for substantial mobile sources of DPM emissions, including truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units.⁵ SCAQMD’s AB 2588 Supplemental Guidelines for Preparing Risk Assessments for the Air Toxics Hot Spots Information and Assessment Act only applies to permitted industrial facilities and does not address so called “short term” projects.⁶

SCAQMD Rule 1402, which implements the Toxic Hot Spots Program in the region, only applies to facilities with one or more AQMD permits to operate, which the Project is not required to obtain, and also does not require analysis of short-term TAC or DPM emissions. Thus, the comment’s assertion that a quantitative HRA is required for the Project is incorrect, as no agency has recognized infill mixed-use residential development as a significant source of toxic air emissions requiring quantitative HRAs. As Project construction activities would vary throughout the site and would be short-term during only one brief portion

of onsite construction activities, stationary source rules would not be appropriate for assessing impacts associated with DPM and an HRA is not required.

Notwithstanding the fact that an HRA is not required under any applicable state, regional, or local regulation, a technical response to this comment has been prepared by Air Quality Dynamics (AQD), which is included as **Exhibit A** to this Response (Health Risk Assessment Evaluation, Air Quality Dynamics, May 20, 2024). AQD demonstrates that SWAPE's assertion of potential significance is based upon misrepresentation of Project construction and operational profiles and the inappropriate application of regulatory guidance, and thus a HRA is not required for the SCEA. Nonetheless, in response to the comment, AQD prepared a construction HRA for informational purposes, which demonstrates that the Project's DPM concentrations were lower than the SWAPE preliminary analysis and that cancer risk estimates are below SCAQMD's significance threshold. The following is a summary of the issues with SWAPE's claims of health risk impact and why the Project would not have a health risk impact:

- First, SWAPE incorrectly assumed that construction operations occur 24 hours per day, 350 days per year for the duration of Project construction. This assumption is inconsistent with the SCEA air quality analysis and supporting technical documentation which notes that construction activities will occur no more than 8 hours per day, 5 days per week or 261 days per year. Incorporation of SWAPE's construction timeline arbitrarily enhances the carcinogenic risk estimates.
- Second, the AERSCREEN dispersion model used in the preliminary HRA is designed to provide "worst-case" one-hour estimates. For sources that have continuous emissions (i.e., 24-hours per day) a fixed scaling ratio of 0.10 is applied to approximate an annual average concentration which is necessary to determine carcinogenic risk estimates. As noted above, the construction operational profile is not continuous whereby a scaling ratio of 0.10 cannot be applied. As such, the predicted model concentrations have no bases to serve as an estimate of DPM exposure.
- Third, SWAPE additionally asserts that particulate (PM₁₀) exhaust emissions, as reported in the project's air quality analysis, be used as a surrogate for DPM emissions to address operational emissions. For this source category, predictive model estimates are associated with area, energy, mobile and stationary sources. On-site area source emissions include hearths and landscape maintenance equipment. Energy related emissions are associated with natural gas and electricity consumption. On-road mobile sources include running and start emissions. In consideration of these source categories, DPM emissions are only associated with a portion of the mobile source profile whereby the predominant source of emissions relates to vehicle miles traveled to and from the project site. Although a portion of start emissions are generated on-site, they are associated with gasoline fueled vehicles and not diesel vehicles. As such, SWAPE's use of the identified exhaust estimates to address on-site operational emissions are not supported by the available emission inventory.
- Fourth, and of most relevance, SWAPE's preliminary analysis utilized the Office of Environmental Health and Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Guidelines (AB 2588, Connolly, Statutes of 1987; Health and Safety Code Section 44300 *et seq.*) which, for certain commercial and industrial operations sources, requires the incorporation of early-life exposure adjustments to characterize carcinogenic exposures when conducting HRAs. The project does not propose uses that are subject to the OEHHA Air Toxics Hot Spots Program Guidelines of AB 2588, nor are transient emissions from off-road mobile sources associated with construction are not sources subject to AB 2588 regulations. As such, the OEHHA Air Toxics Hot Spots Program Guidelines of AB 2588 has no statutory relation to the proposed Project. Neither CARB, SCAQMD, or the US EPA recommend early-life exposure adjustments to characterize carcinogenic exposures. Accordingly, the

incorporation of early-life exposure adjustments is not warranted nor required.

As noted, despite not being required, AQD prepared a HRA for the Project's construction activities for informational purposes, and it demonstrates that the Project's construction would result in carcinogenic risk for the maximum exposed residential receptor of 6.9 in one million (6.9E-06), less than the applicable 10 in one million (10E-06) threshold. An evaluation of the potential noncancer effects of DPM exposure was also conducted. The Project HRA demonstrates that the hazard index for noncancer risks for the Project is 0.063 (6.3E-02), and thus does not exceed the 1.0 threshold. Based upon the predicted carcinogenic risk and noncarcinogenic hazard estimates for the residential exposure scenario, the HRA prepared by AQD, which utilizes accurate Project information and applicable regulatory guidance, demonstrates that construction of the Project will not result in unacceptable localized impacts.

SAFER Comment 14

3. Substantial Evidence Shows that the Project Will Likely Have Significant Biological Impacts.

Wildlife biologists, Dr. Shawn Smallwood, Ph.D. and Noriko Smallwood, M.S., conclude that the Project will have significant biological impacts on special status species. Dr. Smallwood's comments and expert CVs are attached as Exhibit B. As discussed above, the SCS EIR did not mitigate biological impacts to less than significant levels, therefore project-specific CEQA review is required.

Noriko Smallwood conducted a site visit on April 7, 2024. Noriko detected 30 species of vertebrate wildlife at or adjacent to the project site, including four species with special status. Noriko saw Cooper's hawk and red-tailed hawk (Photos 4 and 5), California gull (Photo 6), Allen's hummingbird and hooded oriole (Photos 7 and 8), Cassin's kingbird and California scrub-jay (Photos 9 and 10), house sparrow and California towhee (Photos 11 and 12), white-throated swift and barn swallow (Photos 13 and 14), lesser goldfinch (Photos 15 and 16), mourning dove and Eurasian collared-dove (Photos 17 and 18), house finch and northern mockingbird (Photos 19 and 20), Canada goose (Photo 21), European starling (Photo 22), acorn woodpecker and common raven (Photo 23 and 24), California ground squirrel (Photo 25), among the other species listed in Table 1.

Signs of breeding on and near the site abounded. California towhee, house finch, and house sparrow were actively gathering nest material from the site for nests on and near the site. Lesser goldfinches were paired up and will likely nest on or near the site. Northern mockingbirds were very territorial and will likely nest on or near the site. An Allen's hummingbird displayed to another Allen's hummingbird and was very territorial, indicating they will likely nest on or near the site. Cassin's kingbirds chased each other indicating they will likely nest soon. Birds were very busy on site and the site has a large capacity to support nesting and foraging birds.

Dr. Smallwood states,

Based on Noriko's survey findings, I am certain that at least four sensitive species of vertebrate wildlife occur at the project site. Making direct use of the trees and shrubs on the project site were special-status species including Allen's hummingbird and red-tailed hawk. The project site is habitat of these species.

California gull, Cooper's hawk, Allen's hummingbird, and red-tailed hawk made use of that portion of the aerosphere that the proposed buildings would displace. The aerosphere of the project site is habitat of these species.

(Smallwood Letter, p. 11).

Dr. Smallwood concludes that the Project will adversely affect these species through direct habitat loss, (Id., p. 19), interference with wildlife movement (Id. p. 20), window collisions due to extensive glazing, (Id., p. 21), and cumulative impacts with other projects. (Id. p. 24). Dr. Smallwood predicts that the Project will cause 760 bird deaths annually due to window collisions alone. (Id.).

Response to SAFER Comment 14

As noted in the SCEA on pages 5-55, the Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area.

As further discussed by South Environmental (**Exhibit C**, Biological Responses to Comments, South Environmental, June 4, 2024), the previously developed site is in a heavily urbanized area and lacks the substantial coverage of native plants necessary to attract and support special-status species, which require native habitats to survive. The site was recently entirely developed and has heavy disturbances that remain from the past development, and is overwhelmingly dominated by ruderal invasive plants such as tree-of-heaven. Invasive plants and developments heavily degrade and outcompete native plants and result in an area that is not able to support special-status species. CEQA does not consider the impacts to invasive plants as significant.

The South Environmental Biological Responses to Comments (**Exhibit C**) also specifically rebuts each of the commenter's claims about the California gull, Allen's hummingbird, Red-tailed hawk and Cooper's hawk by demonstrating that the necessary habitat for these species is not present at the site (or in the vicinity) and/or that the species is not considered a special status species. Further, South Environmental addresses the commenter's comments about potential impacts to bats by showing that the SCEA's proposed mitigation measures would avoid significant impacts to bats.

The commenter also presents a unsubstantiated method for determining the number of "predicted" species on the site, concluding based on the 30 species observed at the site over a 2.82-hour period that a total of 81 species are likely to occur there. This method is based on data from the Altamont Pass Wind Resource Area, which was conducted approximately 326 miles away from the Project site and occurred in a very large area of annual grasslands instead of an urban environment. Because it does not take into consideration actual site conditions and location, the commenter's methodology cannot be used to make any supported claims about predicted special-status species that may occur at the site.

Regarding the claim of window collisions, South Environmental explains that studies find that glass that reflects vegetation is more likely to cause bird strikes due to the perceived open space and foraging area that the glass reflects. Therefore, buildings with extensive landscaping may be more likely to cause bird strikes than those with sparse landscaping. The current building plans for the Project show landscaping comprised of several street trees and low-lying shrubs, which is not particularly dense for the area. As the surrounding area of the project site is completely urbanized it is already less attractive for birds that would be flying through in search of resources. The Project's buildings would not pose a substantial risk of strikes to special-status species because they are not attracted to the site and would be migrating to and from areas of native habitats far outside of the dense urban areas of the Project site.

SAFER Comment 15

Dr. Smallwood proposes several mitigation measures that could reduce the Project's impacts to sensitive species, including the use of bird-safe glass, pre-construction surveys to detect species, worker training programs, funding for wildlife rehabilitation facilities and other measures. (Id. 24-28). These impacts and mitigation measures should be analyzed in a project-specific CEQA document.

Response to SAFER Comment 15

South Environmental explains in **Exhibit C** (Biological Responses to Comments, South Environmental, June 4, 2024), the Project's buildings would not pose a substantial risk of strikes to special-status species. The Project site is in a densely urbanized area with tall buildings, and songbirds would not be expected to be particularly attracted to the site given the existing conditions. Further, sporadic deaths that may occur will not endanger the urban songbird population as the area is already well lit and no native habitat or bird nesting habitat occurs on or near the Project site. Special-status species would not be attracted to the site nor would they be migrating at a low elevation over the site as there are no native habitats within many miles of the site. Only dense urban development occurs in all directions indicating that special-status species would avoid the Project site and surrounding areas. Collision-related deaths would be at such a low rate as to not alter the trajectory of bird populations beyond the existing conditions and would therefore not be significant according to CEQA.

Finally, the proposed mitigation measures to reduce bird strikes are not necessary because the potential for impacts from bird collisions is already less than significant. As previously discussed, special-status species avoid urbanized areas like the Project site and use native plant communities, which are not present on the Project site. The proposed nesting bird surveys and nest avoidance measures would result in no impacts to nesting birds protected by the MBTA and Fish and Game Code, and therefore no additional mitigation measures are required.

SAFER Comment 16

CONCLUSION

The SCEA fails to comply with CEQA because it fails to incorporate "all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports," namely, the 2020 Connect SoCal Program EIR. The SCEA is additionally improper because it lacks substantial evidence to support its conclusions that the Project will have less than significant impacts to air quality and biological impacts. Therefore, the City must prepare an initial study to determine the appropriate level of environmental review for the Project. Thank you for considering these comments.

Response to SAFER Comment 16

The comment is a conclusion.

Furthermore, as set forth in the responses above, as well as additional responses and evidence contained in the administrative record such as the SCEA, the Project will not result in potential air quality, health risk impacts, or biological impacts. The SCEA complied with CEQA, conducted a project-level analysis, and included mitigation measures as appropriate. The comment letter does not provide substantial evidence to the contrary.

The comment does not state a specific concern or question regarding the adequacy of the SCEA in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Shalane Miller

April 16, 2024

Miller Comment 1

My name is Shalane Miller, and I am a ten year resident of Everett street. I wasn't able to speak during the hearing, but I would like to add my comments.

Response to Miller Comment 1

The comment is an introduction.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Miller Comment 2

1. During the hearing, it was mentioned that the height of the building is standard, but it would actually be quite large for the neighborhood. Perhaps it's standard for Los Angeles, but not for Echo Park specifically. A similar building recently built on Sunset, the perforated building at 1313 W Sunset, is not nearly as massive. I believe it is only five stories. If you visit the area or even look at the surroundings on Google Maps, it's obvious that a structure of this size will burden the neighborhood and existing residents.

Response to Miller Comment 2

The Project is eligible to receive up to three density bonus incentives/concessions. The Project is seeking an off-menu height incentive to allow increases building height as follows:

- Building A is 7 stories with a maximum height of 91 feet as measured from grade (57 feet Base Height plus 34 feet) and 85 feet as measured from Plumb Height (45 feet plus 40 feet).
- Building B is 7 stories with a maximum height of 86 feet as measured from grade (57 feet Base Height plus 29 feet) and 81.5 feet as measured from Plumb Height (45 feet and 36.5 feet).

The City is obligated by state law to grant the height incentives/concessions as they provide identifiable and actual cost reductions to provide for affordable housing costs (Gov. Code Section 65915(d)(1)(A)).

SB 743 (PRC Section 21099(d)) sets forth new guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment."

The related City of Los Angeles Department of City Planning Zoning Information File (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

Accordingly, the Project is exempt from consideration of aesthetic impacts. Therefore, the following discussion is for informational purposes only.

The Project would be located along a major corridor which is appropriate for siting mixed-use buildings with increased density and units to provide the City much-needed housing units, including affordable units. 7-stories is appropriate and not out-of-scale given the characteristics of the area.

The proposed buildings would not even be the tallest buildings in the immediate area. The residential building at 1115 Sunset Boulevard (The Elysian), 225 feet to the south of the Site, contains approximately 10-stories and is itself situated on a slight elevation. Its entire massing is visible along Sunset Boulevard at Everett Street.

In addition, the residential area to the east along Everett Street is situated on a hill that rises well above the roofs of the proposed building. Figure 5.1-1 of the SCEA, showing a view from Everett Park toward Downtown Los Angeles with the proposed Building B in view would not block any views of Downtown Los Angeles.

The comment is unsubstantiated opinion. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Miller Comment 3

2. There has already been disruption on Everett street due to other construction, thus reducing the quality of life for existing residents as mentioned during the hearing. I believe this is important to note, although dismissed by Dana Sayles. Why are there no restrictions on the density of new construction in an area? There are currently three active construction sites on Everett street.

Response to Miller Comment 3

The City processes, reviews, and regulates land use decisions. Certain projects can be built without City discretionary requests and are by-right. Sunset Boulevard and Everett Street are both in a special grading area of the City and require coordination with the Bureau of Engineering for certain construction truck movements and routes. The Project discloses this Special Grading Area in the SCEA and requested a haul route for the Project. It is beyond the scope of this SCEA and outside of CEQA’s purview to review and regulate other projects. However, the SCEA does include analysis of nearby related projects, including those along Sunset Boulevard and Everett Street. See pages 5-324 to 5-326 of the SCEA, including Table 5.21-1 and Figure 5.21-1.

The comment does not state a specific concern or question regarding the adequacy of the City’s determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm’n* (2011) 202 Cal.App.4th 549.)

Miller Comment 4

3. As a ten year resident, I recognize that I am not native to the area and fear this project will deeply impact the families in the area and contribute to gentrification. This will inevitably drive up already high rent prices for the surrounding areas, and push native residents out of their homes.

Response to Miller Comment 4

The comment is unsubstantiated opinion on potential gentrification in the neighborhood and references increased rent prices. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Further, economic feasibility, market conditions, and economic impacts are not considered environmental impacts under CEQA. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Miller Comment 5

Thank you for considering my comments.

Response to Miller Comment 5

The comment is a conclusion and does not state a specific concern or question regarding the adequacy of the SCEA in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm’n* (2011) 202 Cal.App.4th 549.)

Matt Morello

April 16, 2024

Morello Comment 1

Matt here, I spoke in the public hearing today.

I raised my hand in the meeting a second time because I assumed we were going in order of the list of Actions Requested, and my second comment was in regards to Action 2b.

Response to Morello Comment 1

The comment is an introduction.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Morello Comment 2

2b cites an off menu incentive to allow a 30 percent reduction in required open space to allow 24,540 square feet in lieu of otherwise required 35,050 square feet. I was not given a chance to voice my favor for this action; this space could be allocated to parking, correct?

Response to Morello Comment 2

The comment accurately states one of the Project's proposed off-menu incentive.

The Project provides 24,540 square feet of qualifying open space, consisting of indoor amenities, roof decks, courtyards, and balconies. In addition, there will be 17,025 square feet of additional public and private open space that does not meet the definition in LAMC Section 12.21.G due to noncompliant dimensions or being publicly accessible.

As described in the density bonus findings included in the Project's entitlement case file, the Applicant is seeking an Off-Menu reduction in open space to ensure the project has sufficient building footprint available to provide 41 units dedicated to Very Low Income households, as well as market rate units that offset the cost of the affordable units within the building footprint. The requested incentive does not correlate to the Project's parking.

Morello Comment 3

Further, to comment on Dana's followup, I would like to note that reducing parking to mitigating cost and get a low-income housing discount is reprehensible. Her claims that this will not overflow or overburden Everett Park is simply factually inaccurate.

What action can we as a community take to request 2b to be enforced and increase parking space? What other actions can I take to voice my dissent towards the project?

Response to Morello Comment 3

The Project includes a total of 263 automobile parking spaces to be shared amongst all of the uses on site. Pursuant to State law (Assembly Bill 2097) the Project is not required to provide any parking, but has done so due to the nature of the market in this area and lack of street parking for both residents and visitors.

As stated above, the reduction in open space is necessary to provide sufficient units including affordable units and is not correlated to the Project's parking.

Senate Bill (SB) 743 (Public Resources Code (PRC) Section 21099(d)) sets forth guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 miles 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 adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." As set forth in the SCEA, the Project is located within a TPA.

*Save Our Access*⁷ confirmed that CEQA generally does not consider the adequacy of a project's parking or its "impacts on parking" unless it will result in significant secondary effects on the physical environment. Parking is usually a social and not an environmental impact. Because the petitioner failed to identify any secondary adverse physical effects on the environment resulting from the project's impact on available parking, there is no CEQA impact.

The comment speculates on the amount of vehicles associated with the Project and where they would park. The comment does not provide substantial evidence of a secondary impact on the physical environment including within the Everett Park area.

The comment is therefore unsubstantiated opinion on the potential for parking-related effects in the neighborhood. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), "[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."

⁷ *Save Our Access-San Gabriel Mountains v. Watershed Conservation Authority* (Cal. Ct. App., Aug. 19, 2021, No. B303494) 2021 WL 3673902.

Evan Whale
April 18, 2024

Whale Comment 1

I hope this finds you well! My name is Evan Whale and I was the one who was late to Tuesday's planning meeting who you (very graciously) let speak near the end. My tardiness was due to a confusion around the start time of the meeting, so thank you again for making an exception.

Response to Whale Comment 1

The comment is an introduction.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Whale Comment 2

I want to ask at the top here, was the meeting (in its entirety) recorded by chance? I would love to review what I missed there at the beginning.

Response to Whale Comment 2

The commenter is directed to contact City staff who conducted the hearing for this request.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Whale Comment 3

I know our neighborhood might sound like a broken record with this, but the street light issue that kept coming up during is of paramount concern. Not a week goes by where I don't see my life flash briefly before my eyes when taking a left turn onto Sunset Blvd from Everett Street, and this a feeling that is shared by an overwhelming majority of the residents. This new development will no doubt create increased parking and traffic activity on Everett Street, making our only entry / exit point onto Sunset all the more congested and prone to accidents.

Response to Whale Comment 3

Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a measurement of vehicle miles traveled (VMT) that better addresses the State's goals on reduction of greenhouse gas emissions, creation of multi-modal transportation, and promotion of mixed-use developments. CEQA Guidelines Section 15064.3 states that VMT is the most appropriate measure of transportation impacts, replacing LOS. As analyzed in the SCEA and supported by substantial evidence, the Project would not result in a significant VMT impact or any

other transportation-related environmental impact under CEQA, including any impacts related to transportation-related hazards.⁸

*Mitigation measures are not required for effects which not found to be significant.*⁹ The City is under no obligation under CEQA to accept any particular environmental impact mitigation measures suggested by third parties.¹⁰

Notwithstanding, in consideration of community dialogue regarding this intersection, the Project's traffic engineer, Fehr & Peers, conducted a signal warrant analysis for the Sunset Boulevard / Everett Street intersection to determine the need for a traffic signal at this location under existing City standards and regulations. The satisfaction of a traffic signal warrant does not itself require the installation of a signal, and other factors relative to safety, traffic flow, signal spacing, coordination, etc. should be considered. This signal warrant analysis is included as **Exhibit B** to this Response (Signal Warrant Analysis, Fehr & Peers, May 2024). The following is a summary of the issues with the request for a signal and why it is not warranted:

- Using the Manual on Uniform Traffic Control Devices (MUTCD), the intersection was tested to see if its volumes meet signal warrants. The Sunset Boulevard / Everett Street intersection does not trigger the signal warrant under the Future (2027) Plus Project condition in either the AM or PM peak hours.
- The Project would have no vehicular access via Everett Street. Additionally, the Project is not forecasted to generate any new trips on Everett Street, which is a dead-end street with largely residential uses and would therefore not contribute to the minimum vehicle volume required to trigger a peak hour signal warrant on Everett Street.
- Due to the offset approaches of the Everett Street and Boylston Street intersections with Sunset Boulevard, a potential traffic signal would likely require split phasing (separate and exclusive green phases for Everett Street and Boylston Street, respectively), which necessitates a larger share of the cycle length to be dedicated to the side street approaches, thus increasing vehicular delay on Sunset Boulevard. Additionally, a potential traffic signal would in close proximity (approximately 325 feet) to the existing signal at Marion Avenue.

Whale Comment 4

I remember Dana Sayles saying at some point that she had shared her contact information with a few of the residents on our street. Is there any way I could get that information as well? And Dave Rand – did he replace Jorge Plascencia as the field rep for CD-1? We had been working with Jorge prior about some safety concerns on our street, but after he left we were not given any follow up contact.

Response to Whale Comment 4

The commenter is directed to contact City Councilmember District 1's office for this request.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment

8 SCEA, March 2024, page 5-283. Transportation Assessment, Fehr & Peers, October 2023. Appendix K-1 to the SCEA.

9 CEQA Guidelines Section 15126.4(3).

10 A Local & Reg'l Monitor (ALARM) v City of Los Angeles (1993) 12 Cal.App.4th 1773, 1809.

does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Clay Bush

April 24, 2024

Bush Comment 1

I wanted to submit a few comments regarding this large project.

Retail Spaces –

1) The applicant mentioned that the retail spaces limited due to lower ceilings. This is done by design by the applicant to be able to fit in additional dwelling floors and at the cost of not having truly functional retail spaces that would attract businesses that would contribute to our neighborhood area. One only has to look at the Geoffrey Palmer faux Tuscany buildings blanketing the landscape of DTLA and nearly 100% of the proposed retail spaces in those DB developments are externally vacant, and if a spaces does not get leased the busines never lasts very long. The spaces are poorly designed with the purpose of thwarting businesses from renting them, less headache, and a business write off if not rented. BUT the spaces where used in the applicants project design to appeal Planning for retail spaces to achieve height and density bonuses. We fear Aragon is partly doing the same shell game

Back in 2014-2015 our stakeholders from all around the surrounding neighborhoods to this project site requested more retail and well designed from the applicant and we all believed that was achieved on our dozens of meetings and negotiations. But all that hard work by the stakeholders, residents and neighborhood groups has been tossed in the waste can.

We fear we will end up with Geoffrey Palmer type empty poorly function retail spaces, all because the applicant wants to stretch their food court upwards.

Response to Bush Comment 1

The comment references other retail spaces in unrelated buildings that are not part of the Project and not in the immediate vicinity of the Project. The comment refers to the amount of available retail space. Economic feasibility, market conditions, and economic impacts are not considered environmental impacts under CEQA.

The comment is unsubstantiated opinion and discusses potential economic impacts. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Bush Comment 2

2) In the original project our neighborhoods wanted MORE retail, we are now getting far less and 3 additional stories with over an additional 100 residential units. This project is so far out of scale and character for our very old neighborhood it will forever change the very fabric of it in negative ways.

Response to Bush Comment 2

The comment refers to a prior version of the Project, which is not the current case before the City. The current Project is what was analyzed in the SCEA and is what is being processed by the City.

See **Response to Miller Comment 2**. SB 743 (PRC Section 21099(d)) sets forth new guidelines for evaluating aesthetic impacts for an in-fill, transit-oriented project under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment."

The related City of Los Angeles Department of City Planning Zoning Information File (ZI) No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

Accordingly, the Project is exempt from aesthetic impacts. Therefore, the discussion in **Response to Miller Comment 2** regarding the height and bulk of the Project compared to the surrounding structures is for informational purposes only.

The comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Bush Comment 3

Traffic at Everett and Sunset-

The applicant claims their project and design will have no negative effect on traffic on Everett St. This is illogical and flies in the face of evidence of current activities conducted on the very sidewalk in front of the applicants Building B location, the building that has café/restaurant space designed right on the corner of Sunset and Everett St. The business being placed on the corner is not really an issue for most of us, what is the issue is it will absolutely negatively affect traffic flowing in and out and parking on Everett St, whether it's patrons trying on to Everett to find parking, employees doing the same or ride share vehicles picking up or dropping off to the retail spaces or even residents utilizing such.

The entrance and exit of Everett at Sunset is a very tricky navigation more often than not and becomes very dangerous during high traffic hours as well as leading up to and after events held at Dodger stadium. Accidents are very frequent and with an assumed fairly busy café/restaurant dropped right on that corner it compounds the very dangerous issues residents and visitors already suffer.

Response to Bush Comment 3

See **Response to Whale Comment 3** for an explanation as to why it is not warranted.

Bush Comment 4

DOT MUST design a light that is sunked [synched] up with Marion St like is done in West Hollywood with very short distanced street corners. This would not "slow down" traffic, as Dana Sayles claims, but would

old [all] work in concert with the already existing Marion light and create a safe controlled in and out avenue for all us residents. The claims Mrs. Sayles makes here are driven by her client trying to cut corners and save money. But we residents will pay the price if a paired up stop light is not installed but this behemoth of a cruise ship project is.

Response to Bush Comment 4

See **Response to Whale Comment 3** for an explanation as to why it is not warranted.

Bush Comment 5

This project and all its activities predicted after it is completed and occupied will ABSOLUTELY negatively affect Everett and White Knoll, to a lower extent.

Response to Bush Comment 5

The Project does not abut White Knoll Drive and is not forecasted to generate any new trips on White Knoll Drive. The comment is unsubstantiated opinion regarding unspecified negative effects. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Bush Comment 6

You should come down and witness how bad the traffic is on a normal weekday or leaving up to a Dodgers event, it gets so bad that Dodgers has had to have LADOT’s Traffic Enforcement officers control the intersection at Everett.

Response to Bush Comment 6

The Project is not responsible for the traffic associated with events at Dodger Stadium. However, to avoid conflicts with events at the Dodgers Stadium, the Project will implement Project Design Feature PDF-TRAN-1.¹¹

- To accommodate Project construction, closure of the northbound parking/PM peak hour bus lane on Sunset Boulevard along the Project frontage is anticipated between 6:30 AM and 4:00 PM, so as not to interfere with PM peak hour buses or the Dodger Stadium Express bus route during home games.

In addition, the SCEA contains an LOS and queuing analysis, which was completed to understand Project driveway operations during the AM, PM, and PM with Dodgers game peak hours. This analysis demonstrates that the Project driveways/access points are expected to operate with limited queues and acceptable LOS.¹²

Bush Comment 7

¹¹ SCEA, March 2024, page 5-283.

¹² Transportation Assessment, Fehr & Peers, October 2023, page 54. Appendix K-1 to the SCEA.

Previous project-

The client is claiming that the previous very large project is all of a sudden “not financially feasible”. This makes absolutely not rationale sense. They just want to build three additional floors higher that further invades and oppress our historic old neighborhood and clogs the land channel that is Sunset Blvd from Marion to Vin Scully Way. The applicant most certainly could build the previously negotiated project as they promised the neighborhood. But instead they choose to hide behind State laws and or ordinances to push for three additional floors towering above our neighborhood.

Response to Bush Comment 7

The comment is unsubstantiated opinion and discusses potential economic impacts. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Bush Comment 8

Construction materials-

-The project in its presented for is an enormous modern styled structure that will stand and tower in an insanely stark contrast to our late 1800s historic neighborhood.

Response to Bush Comment 8

Regarding aesthetic impacts, see **Response to Miller Comment 2**.

While there are no structures on the Project site, using City data, the immediate area has a range of building ages, dated from the late 1890s to the 2020s.¹³ Accordingly, to analyze the potential impacts on historic resources, a Historical Resources Technical Report was prepared for the Project and is included as Appendix D-1 of this SCEA. The Historical Resources Technical Report concluded that due to the lack of historic resources on the Project site, the Project would have no direct impacts.

The Historical Resources Technical Report also concluded that the Project would have a less than significant indirect impact on the identified historical resources in the vicinity. The proposed new buildings would introduce a new visual element to the broader context of the identified historical resources; however, the Project would not alter any of the physical characteristics that convey their significance and justify their eligibility as historical resources defined by CEQA. The historical resources would not be materially impaired by the Project. No other historic resources would be demolished, altered, rehabilitated, converted, or relocated by the Project. No other historic resource has the potential to be adversely affected by the new construction or by excavation and construction activity.

The Project would not result in a substantial adverse change to the immediate surroundings of nearby historic resources, to the degree that they would no longer be eligible for listing under national, state, or

¹³ https://cityhubla.github.io/LA_Building_Age/#16/34.0691/-118.2502

local landmark or historic district programs. As such, impacts would be less than significant, and no mitigation measures are required.

The comment is unsubstantiated opinion and discusses subjective design decisions. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Bush Comment 9

-The design, materials and color scheme will be a massive sun reflecting structure in the afternoon and will cause surface heat to radiate onto all the buildings on that west side. Case and point would be the Walt Disney concert hall in its first completed condition, shiny stainless steel that reflected the sun into all the buildings surrounding it, which the city then forced Frank Gehry to then dull down the beautiful building. But in this case, the overwhelmingly white buildings will be not be able to be dulled down. Nope, we will all be stuck with a giant building design that belongs in Miami or South Beach.

Response to Bush Comment 9

Regarding aesthetic impacts (glare), see **Response to Miller Comment 2**.

Nonetheless, LAMC Chapter 9, Article 3, Section 93.0117(b) provides that no exterior light source may cause more than 2 foot-candles (21.5 lx) of light intensity or generate direct glare onto exterior glazed windows or glass doors; elevated porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any property containing a residential unit or units. As it relates to glare, sun reflection from Project development could occur when the sun is low on the horizon, and motor vehicle operations could be affected when the point of reflection within the Project Site is in front of the driver. The Project would feature a variety of surface materials, including, but not limited to, glass, concrete, timber, and metal. As part of the Project, glass used in building facades would have high-performance coatings that would not be highly reflective, thereby minimizing glare from reflected sunlight.

The comment is unsubstantiated opinion and discusses subjective design decisions. The commenter does not provide substantial evidence that the Project would result in physical changes to the environment. Under Public Resources Code (PRC) Section 21082.2(c), “[a]rgument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.”

Bush Comment 10

I am attaching one of the 2014-15 agreements sheets listing all that Aragon agreed to for reference.

Thank you for your attention to this applicant's application.

Response to Bush Comment 10

The comment included a list of proposed voluntary community benefits associated with a prior version of the Project, which is no longer being pursued, and therefore these measures are not pertinent to the current Project. In addition, the comment does not state a specific concern or question regarding the adequacy of the City's determination and approval in identifying and analyzing the environmental impacts of the Project, nor does the comment identify any physical environmental impacts caused by the Project. Therefore, this comment does not require a detailed response. (CEQA Guidelines, § 15088(c); *Citizens for East Shore Parks v. State Lands Comm'n* (2011) 202 Cal.App.4th 549.)

Exhibit A

Health Risk Assessment Evaluation

May 20, 2024

Aragon Properties Ltd.
Los Angeles, California 90026
Attn: Jeff Farrington

Re: Sunset and Everett Project (ENV-2023-5529-SCEA) - Health Risk Assessment Evaluation

Mr. Farrington:

Per your request, Air Quality Dynamics has reviewed the Lozeau Drury, LLP and associated comments by SWAPE which allege the Sustainable Communities Environmental Assessment (SCEA) failed to provide a quantitative evaluation of the health risks to nearby sensitive receptors exposed to diesel particulate matter (DPM) emissions generated during construction and operation of the proposed Project. To exemplify their concern, SWAPE prepared a "preliminary HRA" which reported cancer risk estimates for adjoining residents exceed the maximum incremental cancer risk of 10 in one million (10E-06) established by the South Coast Air Quality Management District (SCAQMD) for projects prepared under the auspices of the California Environmental Quality Act (CEQA).

As a result, SWAPE contends that a "potentially significant health risk impact" exists whereby "a refined health risk analysis which adequately and accurately evaluates health risk impacts associated with both Project construction and operation" be prepared.

In response, the following discussion illustrates the commenters assertion of potential significance is based upon the misrepresentation of Project construction and operational profiles and the inappropriate application of regulatory guidance. To begin, SWAPE incorrectly assumed that construction operations occur 24 hours per day, 350 days per year for the duration of Project construction. This assumption is inconsistent with the SCEA air quality analysis and supporting technical documentation which notes that construction activities will occur no more than 8 hours per day, 5 days per week or 261 days per year. Incorporation of SWAPE's construction timeline arbitrarily enhances the carcinogenic risk estimates.

Second, the AERSCREEN dispersion model used in the preliminary HRA is designed to provide "worst-case" one-hour estimates. For sources that have continuous emissions (i.e., 24-hours per day) a fixed scaling ratio of 0.10 is applied to approximate an annual average concentration which is necessary to determine carcinogenic risk estimates. As noted above, the construction operational profile is not continuous whereby a scaling ratio of 0.10 cannot be applied. As such, the predicted model concentrations have no bases to serve as an estimate of DPM exposure.

Third, SWAPE additionally asserts that particulate (PM₁₀) exhaust emissions, as reported in the project's air quality analysis, be used as a surrogate for DPM emissions to address operational emissions. For this source category, predictive model estimates are associated with area, energy,

mobile and stationary sources. On-site area source emissions include hearths and landscape maintenance equipment. Energy related emissions are associated with natural gas and electricity consumption. On-road mobile sources include running and start emissions. In consideration of these source categories, DPM emissions are only associated with a portion of the mobile source profile whereby the predominant source of emissions relate to vehicle miles traveled to and from the project site. Although a portion of start emissions are generated on-site, they are associated with gasoline fueled vehicles and not diesel vehicles. As such, SWAPE's use of the identified exhaust estimates to address on-site operational emissions are not supported by the available emission inventory.

Notwithstanding the above inconsistencies, of most relevance is the preliminary HRA utilized the Office of Environmental Health and Hazard Assessment (OEHHA) Air Toxics Hot Spots Program guidelines (AB 2588, Connelly, Statutes of 1987; Health and Safety Code Section 44300 et seq.) which, for sources subject to the guidelines, must incorporate early-life exposure adjustments to characterize carcinogenic exposures when conducting HRAs. Transient emissions from off-road mobile sources associated with construction of the proposed Project are not subject to AB 2588 regulation. As such, AB 2588 guidance has no statutory relation to the proposed Project whereby the incorporation of early-life exposure adjustments are not warranted nor required. As noted by the California Air Resources Board (CARB).

The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in September 1987. Under this, stationary sources are required to report the types and quantities of certain substances their facilities routinely release into the air. Emissions of interest are those that result from the routine operation of a facility or that are predictable, including but not limited to continuous and intermittent releases and process upsets or leaks.

The Act requires that toxic air emissions from stationary sources (facilities) be quantified and compiled into an inventory according to criteria and guidelines developed by the ARB, that each facility be prioritized to determine whether a risk assessment must be conducted, that the risk assessments be conducted according to methods developed by the Office of Environmental Health Hazard Assessment (OEHHA).

As reported above, AB 2588 applies to certain commercial and industrial operations that have the potential to generate quantities of criteria and toxic air emissions that could present health risks. There are two broad classes of facilities subject to the AB 2588 Program: Core facilities and facilities identified within discrete industry-wide source categories. Core facilities subject to AB 2588 compliance are sources whose criteria pollutant emissions (particulate matter, oxides of sulfur, oxides of nitrogen and volatile organic compounds) are 25 tons per year or more as well as those facilities whose criteria pollutant emissions are 10 tons per year or more but less than 25 tons per year. Industry-wide source facilities are classified as smaller operations with relatively similar emission profiles (e.g., auto body shops, gas stations and dry cleaners using perchloroethylene). It is apparent that the emissions generated from the construction of a mixed-use residential development are not classified as core operations nor subject to industry-wide source evaluation.

Additionally, in comments presented to the SCAQMD Governing Board (Meeting Date: June 5, 2015, Agenda No. 28) relating to toxic air contaminant exposures under Rules 1401, 1401.1, 1402 and 212 revisions, use of the revised OEHHA guidelines and their applicability for projects subject to CEQA as they relate to the incorporation of early-life exposure adjustments, it was reported that:

The Proposed Amended Rules are separate from the CEQA significance thresholds. SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board.

To date, the SCAQMD, as a commenting agency, has not conducted public workshops nor developed policy relating to the applicability of applying the revised OEHHA guidance for projects prepared by other public/lead agencies subject to CEQA.

In addition, the California Department of Toxic Substances Control (DTSC), which is charged with protecting individuals and the environment from the effects of toxic substances and responsible for assessing, investigating and evaluating sensitive receptor populations to ensure that properties are free of contamination or that health protective remediation levels are achieved, has adopted the U.S. Environmental Protection Agency's policy in the application of early-life exposure adjustments and is consistent with the methodology considered in the assessment of sensitive receptor exposures.

Specifically, U.S. Environmental Protection Agency guidance relating to the use of early-life exposure adjustments (*Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens*, EPA/630/R-003F) are considered when carcinogens act "through the mutagenic mode of action." As reported:

The Agency considered both the advantages and disadvantages of extending the recommended, age dependent adjustment factors for carcinogenic potency to carcinogenic agents for which the mode of action remains unknown. EPA recommends these factors only for carcinogens acting through a mutagenic mode of action based on a combination of analysis of available data and long-standing science policy positions that set out the Agency's overall approach to carcinogen risk assessment, e.g., the use of a linear, no threshold extrapolation procedure in the absence of data in order to be health protective. In general, the Agency prefers to rely on analyses of data rather than on general defaults. When data are available for a susceptible lifestage, they should be used directly to evaluate risks for that chemical and that lifestage on a case-by-case basis. In the case of nonmutagenic carcinogens, when the mode of action is unknown, the data were judged by EPA to be too limited and the modes of action too diverse to use this as a category for which a general default adjustment factor approach can be applied. In this situation per the Agency's *Guidelines for Carcinogen Risk Assessment*, a linear low-dose extrapolation methodology is recommended. It is the Agency's long-standing

science policy position that use of the linear low-dose extrapolation approach (without further adjustment) provides adequate public health conservatism in the absence of chemical-specific data indicating differential early-life susceptibility or when the mode of action is not mutagenicity.

In 2006, the U.S. Environmental Protection Agency published a memorandum that provides guidance regarding the preparation of HRAs should carcinogenic compounds elicit a mutagenic mode of action (USEPA, 2006). As presented in the technical memorandum, numerous compounds were identified as having a mutagenic mode of action. For DPM, polycyclic aromatic hydrocarbons (PAHs) and their derivatives, which are known to exhibit a mutagenic mode of action, comprise < 1% of the exhaust particulate mass. To date, the U.S. Environmental Protection Agency reports that whole diesel engine exhaust has not been shown to elicit a mutagenic mode of action (USEPA, 2018).

As noted above, SWAPE's inaccurate characterization of the Project's construction and operational profiles and inappropriate use of regulatory guidance cannot be relied upon as a viable screening-level methodology. As such, Air Quality Dynamics presents a refined HRA to address construction related emissions utilizing all relevant and appropriate assessment and dispersion modeling methodologies presented by the U.S. Environmental Protection Agency, California Environmental Protection Agency and SCAQMD to ensure a viable quantification of DPM exposures associated with the generation of emissions from construction related activities.

Results of the refined health risk assessment showed lower DPM concentrations than the SWAPE screening-level analysis and cancer risk estimates below SCAQMD's significance threshold. The following discussion outlines the methodology utilized to conduct the refined health risk assessment and presents the revised estimate of risk.

Source Identification

The Project proposes the construction of a mixed-use residential and commercial development with 327 residential units (286 market-rate units and 41 affordable units) and 9,462 square feet of commercial space with sit-down restaurant uses. The Project consists of two adjacent buildings. Building A, located along Sunset Boulevard is 7-stories with 4 levels of Type IIIA construction over 3 levels of Type I podium. Building B, which is located at the corner of Sunset Boulevard and Everett Street is 7-stories with 5 levels of Type IIIA construction over 2 levels of Type I podium. The Project includes 13 studio units, 230 1-bedroom units, 79 2-bedroom units and 5 3-bedroom units. Six units on the ground floor within Building A will be designed for live/work occupancies. Tenant amenities include a pool/spa deck, roof decks, fitness, club and community room accessibility. The Project will additionally provide 12,881 square feet of landscaped common open space with additional landscaping provided on the slope portion to the rear of Building A.

The Project's estimated operational year is 2027 with construction to commence in the fourth quarter of 2024. The site is vacant of all structures and contains 6,000 square feet of asphalt that

will be demolished and removed. It is assumed the Project will over-excavate soils to a depth of up to 62 feet to accommodate the subterranean levels, foundation elements and grading under the descending slope in the northeast corner of the site. The amount of excavated earth materials exported will be approximately 40,000 cubic yards.

The Project is located on the east side of Sunset Boulevard, north of Everett Street, in the Silver Lake-Echo Park-Elysian Valley Community Plan area of the City of Los Angeles in the County of Los Angeles. The Site is zoned C2-1VL (Commercial zone in Height District 1VL) and is subject to a General Commercial land use designation.

The site is bound by multi-family residential buildings to the north, commercial occupancies to the south, multi-family residential buildings to the east and commercial/residential buildings to the west. Figure 1 presents an aerial photograph of the Project location and adjoining land uses.

Figure 1
Site Location /Vicinity Aerial Photograph



Source Characterization

On-site construction emission estimates were based upon the Los Angeles-South Coast County profile generated by the California Emissions Estimator Model (CalEEMod) prepared by Douglas Kim and Associates, LLC for the SCEA air quality analysis. CalEEMod is an emissions model which provides a uniform platform quantifying pollutant emissions associated with project construction and operation. The model is considered a comprehensive tool for quantifying air quality impacts for land use development projects located throughout the State.

In 1998, diesel exhaust emissions in the PM₁₀ particle size range were identified by the State as a toxic air contaminant. As such, the off-road PM₁₀ exhaust estimates reported by CalEEMod, which assumed compliance with design feature PDF-AIR-1 whereby off-road diesel-powered equipment within the construction inventory shall meet Tier 4 final off-road emission standards and equipped with Best Available Control Technology (BACT) devices including California Air Resources Board certified Level 3 Diesel Particulate Filters or equivalent. The emission rates for both winter and summer scenarios were found to be commensurate.

To assess localized impacts, construction phase, calendar year and number of days associated with each activity were identified to produce average daily emission rates. Construction operations are reported to occur for 657 days over a 919-day period (2.52 years) based upon a 5 day per week operational schedule which accounts for a portion of concurrent phase activities during building construction and architectural coating operations.

Tables 1 and 2 provide a summary of estimated average daily particulate emissions associated with each construction phase and year. Attachment B presents the emission calculation worksheets used to quantify pollutant source strength for identified construction phases commensurate with the lateral extent across the Project site. A copy of the CalEEMod output file which highlights the identified construction phase activities and associated emission rates are provided in Attachment C.

Table 1
Average Daily Emissions/PM₁₀
Demolition/Site Preparation/Grading

Construction Phase/Year	Emissions (Lbs/Day)
Demolition/2024	0.03
Site Preparation/2025	0.05
Grading/2025	0.14
Average Daily Emissions	0.1221

Table 2
Average Daily Emissions/PM₁₀
Trenching/Building Construction/Architectural Coating

Construction Phase/Year	Emissions (Lbs/Day)
Trenching/2025	0.08
Building Construction/2025	0.47
Building Construction/2026	0.42
Building Construction/2027	0.36
Building Construction/Architectural Coating/2027	0.48
Architectural Coating/2017	0.12
Average Daily Emissions	0.4064

In order to assess the impact of DPM emissions, air quality modeling utilizing the AMS/EPA Regulatory Model AERMOD was performed. AERMOD is a steady-state Gaussian plume model applicable to directly emitted air pollutants that employs best state-of-practice parameterizations for characterizing meteorological influences and atmospheric dispersion. AERMOD is the U.S. Environmental Protection Agency's guideline model for the assessment of near-field pollutant dispersion.

The SCAQMD provides guidance (*Localized Significance Threshold Methodology*, July 2008) on the evaluation of localized air quality impacts to public agencies conducting environmental review of projects located within its jurisdiction. As such, source treatment outlined in the Localized Significance Threshold (LST) methodology was utilized, whereby exhaust emissions from construction equipment were treated as a set of side-by-side elevated volume sources with a release height of five meters and an initial vertical (sigma z) dimension of 1.4 meters. The elevated source characterization accounts for a mid-range plume rise height associated with exhaust stack emissions for typical off-road equipment inventories. Horizontal (sigma y) parameters were produced by dividing source separation distances by a standard deviation of 2.15.

To accommodate a Cartesian grid format, direction dependent calculations were obtained by identifying the universal transverse mercator (UTM) coordinates for each volume source location. UTM coordinates were identified for residential receptors adjoining the Project site. Flagpole receptor heights were not assigned. Terrain height adjustments were incorporated into the modeling exercise to account for the discrepancy in source-receptor elevations. A graphical representation of the source and receptor grid networks are presented in Figures 2 through 4.

Figure 2
Construction Emission Sources
Demolition/Site Preparation/Grading

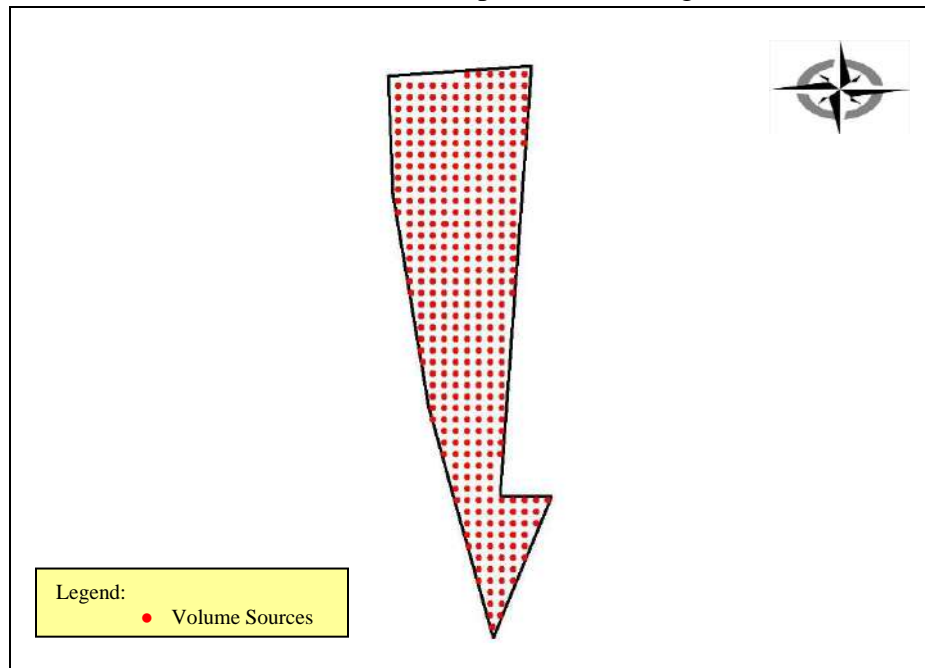


Figure 3
Construction Emission Sources
Trenching/Building Construction/Architectural Coating

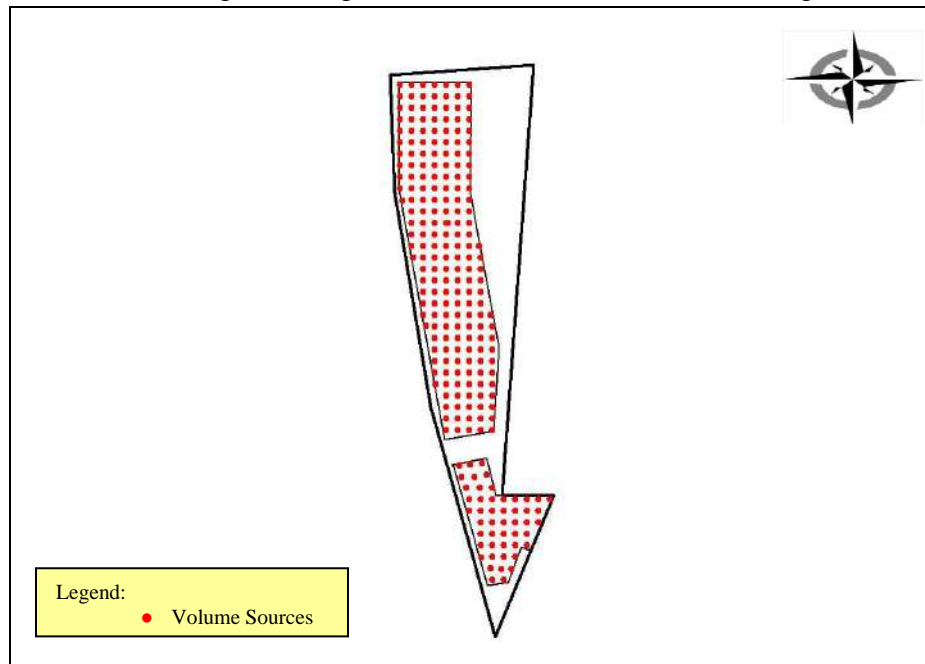
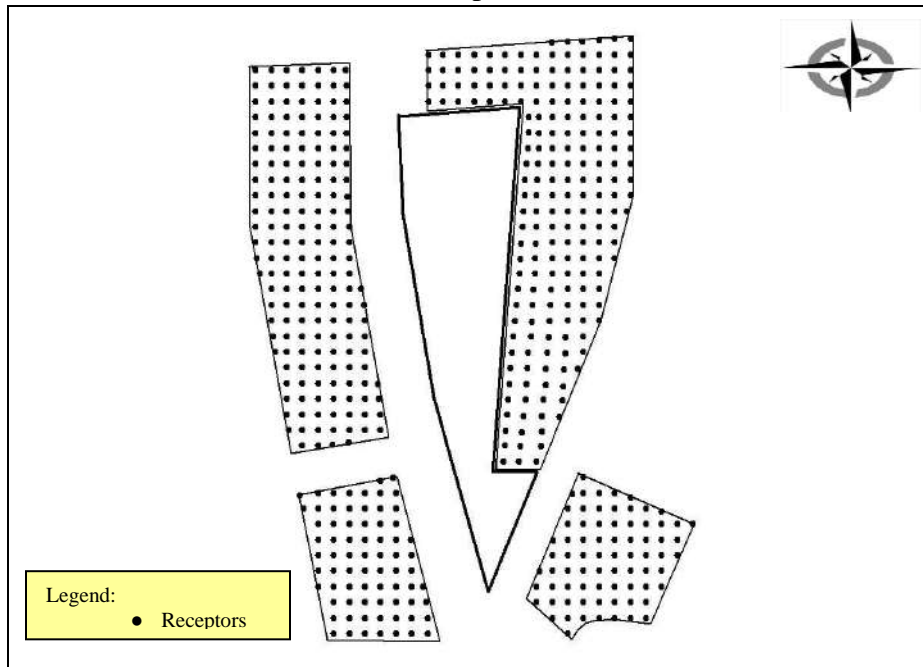


Figure 4
Residential Receptor Locations



Refined air dispersion models require meteorological information to account for local atmospheric conditions. Due to their sensitivity to individual meteorological parameters such as wind speed and direction, the U.S. Environmental Protection Agency recommends that meteorological data used as input into dispersion models be selected on the basis of relative spatial and temporal conditions that exist in the area of concern. In response to this recommendation, meteorological data from the SCAQMD Central Los Angeles monitoring station which is located 1.33 miles east of the Project site was used to represent local weather conditions and prevailing winds. In a manner consistent with SCAQMD guidance for the assessment of chronic exposures, maximum concentrations were produced by incorporating all five years of available data. A model scalar value of 1 was assigned to account for emissions generated during construction-related activity corresponding to 8 hours per day as reported in the CalEEMod construction profile from 8 a.m. to 4 p.m. (ending hours 9 to 16). A scalar value of 0 was used for non-operational hours.

Attachment D provides the AERMOD dispersion model input and summary output files associated with the assessment of residential exposures.

Risk Characterization

Carcinogenic compounds are not considered to have threshold levels (i.e., dose levels below which there are no risks). Any exposure, therefore, will have some associated risk. As a result, the SCAQMD has established a maximum incremental cancer risk which meets or exceeds a threshold of 10 in one million (10E-06) for projects prepared under CEQA. This threshold is also

consistent with the State of California as a level posing no significant risk for exposures to carcinogens regulated under the Safe Drinking Water and Toxic Enforcement Act (Proposition 65).

Health risks associated with exposure to carcinogenic compounds can be defined in terms of the probability of developing cancer as a result of exposure to a chemical at a given concentration. Under a deterministic approach (i.e., point estimate methodology), the cancer risk probability is determined by multiplying the chemical's annual concentration by its unit risk factor (URF). The URF is a measure of the carcinogenic potential of a chemical when a dose is received through the inhalation pathway. It represents an upper-bound estimate of the probability of contracting cancer as a result of continuous exposure to an ambient concentration of one microgram per cubic meter ($\mu\text{g}/\text{m}^3$) over a 70-year lifetime. The URF and corresponding cancer potency factor for DPM utilized in the assessment was obtained from the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values*.

To quantify dose, the procedure requires the incorporation of several discrete exposure variates. To account for upper-bound exposures associated with residential occupancies, lifetime risk values were adjusted to account for an exposure frequency of 261 days per year for a period of 2.52 years (i.e., 0.25 years for the third trimester, 2.0 years for ages 0 to 2 and 0.27 years for the 2 to 9 year age group). Point estimates for daily breathing rates representing the 95th percentile of 361, 1090 and 861 L/kg-day for the identified age groups were utilized and incorporated into the following dose algorithm.

$$Dose_{air} = C_{air} \times \{BR/BW\} \times A \times EF \times 10^{-6}$$

Where:

$Dose_{air}$	=	dose through inhalation (mg/kg/day)
C_{air}	=	concentration of contaminant in air ($\mu\text{g}/\text{m}^3$)
$\{BR/BW\}$	=	daily breathing rate normalized to body weight (L/kg body weight/day)
A	=	inhalation absorption factor (unitless)
EF	=	exposure frequency (days/365 days)
10^{-6}	=	micrograms to milligrams conversion

The above inhalation dose estimates and residential fractional time adjustments (i.e., 0.85 for the third trimester and ages 0 to 2 years and 0.72 for ages 2 to 9 years) were incorporated into the following equation to produce carcinogenic risk estimates for ages commensurate with the reported exposure durations:

$$Risk_{inh} = Dose_{air} \times CPF \times ED/AT \times FAH$$

Where:

$Risk_{inh}$	=	inhalation cancer risk
$Dose_{air}$	=	daily inhalation dose (mg/kg/day)
CPF	=	inhalation cancer potency factor ($\text{mg}/\text{kg}/\text{day}^{-1}$)
ED	=	exposure duration for specified age group (years)
AT	=	averaging time (years)
FAH	=	fraction of time at home (unitless)

Table 3 presents the carcinogenic risk estimates for the maximum exposed residential receptor located immediately southeast of the Project site. Attachment A, Tables A1 through A3, column b identify the predicted DPM concentration, columns f-h, present the URF, corresponding cancer potency factor and dose for each exposure scenario. The cancer risk estimate is presented in column i.

Table 3
Carcinogenic Risk / Maximum Exposed Residential Receptor

Age Group	Risk
Third Trimester	7.0E-08
0 to 2 years	6.3E-06
2 to 9 years	5.7E-07
Total	6.9E-06

Note: 6.9E-06 denotes an excess case of cancer of 6.9 in one million (1,000,000) individuals exposed.

As noted above, the carcinogenic risk for the maximum exposed residential receptor did not meet or exceed the significance threshold of 10 in one million (10E-06).

An evaluation of the potential noncancer effects of DPM exposure was also conducted. Under the point estimate approach, adverse health effects are evaluated by comparing the pollutant concentration with the appropriate Reference Exposure Level (REL). The chronic REL presented in the *Consolidated Table of OEHH/ARB Approved Risk Assessment Health Values* was considered in the assessment. There are no available acute/8-hour reference exposure levels for DPM.

To quantify noncarcinogenic impacts, the hazard index approach was used. The hazard index assumes that subthreshold exposures adversely affect a specific organ or organ system (i.e., toxicological endpoint). To calculate the hazard index, the pollutant concentration or dose is divided by its toxicity value. Should the total equal or exceed one (i.e., unity), a health hazard is presumed to exist. No exposure frequency or duration adjustments are considered for noncarcinogenic exposures.

Table 4 presents the hazard index value for the maximum exposed residential receptor. Attachment A, Tables A1 through A3, column j presents the REL used in the evaluation of chronic noncarcinogenic exposures. The noncancer hazard index generated from off-road equipment activity is presented in column l.

Table 4
Noncarcinogenic Hazard / Maximum Exposed Residential Receptor

Receptor	Hazard
Immediately southeast of the Project site	6.3E-02

Note: 6.3E-02 is commensurate with a numeric value of 0.063.

As noted above, the hazard index for the respiratory endpoint totaled less than one for the maximum exposed residential receptor.

Conclusion

Based upon the predicted carcinogenic risk and noncarcinogenic hazard estimates for the residential exposure scenario, the refined HRA demonstrates that construction of the proposed Project will not result in unacceptable localized impacts.

I can be reached at (818) 703-3294 should you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "BP 73.", is positioned above the printed name.

Bill Piazza

Attachment A: Carcinogenic Risk/Noncarcinogenic Hazard Calculation Worksheet
Attachment B: Emission Calculation Worksheets
Attachment C: CalEEMod Output File
Attachment D: Dispersion Model Input and Summary Output Files
Attachment E: List of References

ATTACHMENT A

Carcinogenic Risk/Noncarcinogenic Hazard Calculation Worksheet

Table A1
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Maximum Exposed Residential Receptor (Third Trimester)
Demolition/Site Preparation/Grading

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
On-Site Exhaust	0.08460	8.46E-05	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	2.2E-05	7.0E-08	5.0E+00	1.4E-03	1.7E-02
TOTAL								7.0E-08	1.7E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year) 261
 exposure duration (years) 0.25
 inhalation rate (L/kg-day)) 361
 inhalation absorption factor 1
 averaging time (years) 70
 fraction of time at home 0.85

Table A2
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Maximum Exposed Residential Receptor (0 to 2 Year Age Group)
Trenching/Building Construction/Architectural Coating

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
On-Site Exhaust	0.31642	3.16E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	2.5E-04	6.3E-06	5.0E+00	1.4E-03	6.3E-02
TOTAL								6.3E-06	6.3E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year) 261
 exposure duration (years) 2
 inhalation rate (L/kg-day)) 1090
 inhalation absorption factor 1
 averaging time (years) 70
 fraction of time at home 0.85

Table A3
Quantification of Carcinogenic Risks and Noncarcinogenic Hazard
Maximum Exposed Residential Receptor (2 to 9 Year Age Group)
Trenching/Building Construction/Architectural Coating

Source (a)	Mass GLC		Weight Fraction (d)	Contaminant (e)	Carcinogenic Risk				Noncarcinogenic Hazard		
	(ug/m ³) (b)	(mg/m ³) (c)			URF (ug/m ³) ⁻¹ (f)	CPF (mg/kg/day) ⁻¹ (g)	DOSE (mg/kg-day) (h)	RISK (i)	REL (ug/m ³) (j)	RfD (mg/kg/day) (k)	RESP (l)
On-Site Exhaust	0.31642	3.16E-04	1.00E+00	Diesel Particulate	3.0E-04	1.1E+00	1.9E-04	5.7E-07	5.0E+00	1.4E-03	6.3E-02
TOTAL								5.7E-07	6.3E-02		

Note:

Exposure factors used to calculate contaminant intake

exposure frequency (days/year) 261
 exposure duration (years) 0.27
 inhalation rate (L/kg-day)) 861
 inhalation absorption factor 1
 averaging time (years) 70
 fraction of time at home 0.72

ATTACHMENT B

Emission Calculation Worksheets

Emission Calculation Worksheet
 CalEEMod Version 2022.1.1.22

Emissions	Phase	Start/End Dates	Lb/Day	# Days	Emissions
On-Site	Demolition	12/24/24 to 12/31/24	0.03	6	0.18
Exhaust PM10	Site Preparation	01/01/25 to 01/15/25	0.05	11	0.55
	Grading	01/16/25 to 04/30/25	0.14	75	10.50
				92	11.23
Average Daily Construction (Lb/Day)					0.1221
Exhaust PM10			Combustion mass		Combustion g/s/source
	Combustion Sources	383	0.1221	5.0195E-06	

Emission Calculation Worksheet
 CalEEMod Version 2022.1.1.22

Emissions	Phase	Start/End Dates	Lb/Day	# Days	Emissions
On-Site	Trenching	05/01/25 to 05/31/25	0.08	22	1.76
Exhaust PM10	Building Construction	06/01/25 to 12/31/25	0.47	153	71.91
	Building Construction	01/01/26 to 12/31/26	0.42	261	109.62
	Building Construction	01/01/27 to 03/31/27	0.36	64	23.04
	Building Construction/Architectural Coating	04/01/27 to 05/31/27	0.48	43	20.64
	Architectural Coating	06/01/27 to 06/30/27	0.12	22	2.64
				565	229.61
Average Daily Construction (Lb/Day)					0.4064
Exhaust PM10			Combustion mass	Combustion g/s/source	
	Combustion Sources	247	0.4064	2.5913E-05	

ATTACHMENT C

CalEEMod Output File

Sunset Everett (Future) Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.3. Construction Emissions by Year, Mitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

2.6. Operations Emissions by Sector, Mitigated

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

3.2. Demolition (2024) - Mitigated

3.3. Site Preparation (2025) - Unmitigated

3.4. Site Preparation (2025) - Mitigated

3.5. Grading (2025) - Unmitigated

3.6. Grading (2025) - Mitigated

3.7. Building Construction (2025) - Unmitigated

3.8. Building Construction (2025) - Mitigated

3.9. Building Construction (2026) - Unmitigated

3.10. Building Construction (2026) - Mitigated

3.11. Building Construction (2027) - Unmitigated

3.12. Building Construction (2027) - Mitigated

3.13. Architectural Coating (2027) - Unmitigated

3.14. Architectural Coating (2027) - Mitigated

3.15. Trenching (2025) - Unmitigated

3.16. Trenching (2025) - Mitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.1.2. Mitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.2. Electricity Emissions By Land Use - Mitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.2.4. Natural Gas Emissions By Land Use - Mitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.3.2. Mitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.4.2. Mitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.5.2. Mitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.6.2. Mitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.7.2. Mitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.8.2. Mitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.9.2. Mitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.9.2. Mitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.10.4. Landscape Equipment - Mitigated

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.11.2. Mitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.12.2. Mitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.13.2. Mitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.14.2. Mitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.15.2. Mitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Sunset Everett (Future)
Construction Start Date	12/24/2024
Operational Year	2027
Lead Agency	City of Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	1185 W Sunset Blvd, Los Angeles, CA 90026, USA
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4029
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas
App Version	2022.1.1.22

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Apartments Mid Rise	327	Dwelling Unit	2.30	311,838	37,095	—	773	—
High Turnover (Sit Down Restaurant)	9.46	1000sqft	0.16	9,462	0.00	—	—	—
Enclosed Parking with Elevator	263	Space	0.00	105,200	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers
Construction	C-6	Use Diesel Particulate Filters
Energy	E-15	Require All-Electric Development

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	38.0	48.8	78.9	0.12	1.62	4.91	6.52	1.49	1.17	2.66
Mit.	35.7	28.5	88.6	0.12	0.50	4.91	5.41	0.47	1.17	1.64
% Reduced	6%	42%	-12%	—	69%	—	17%	68%	—	38%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	5.85	42.5	65.3	0.09	1.60	4.17	5.77	1.46	1.00	2.46
Mit.	3.90	25.9	67.7	0.09	0.50	4.17	4.66	0.45	1.00	1.45
% Reduced	33%	39%	-4%	—	69%	—	19%	69%	—	41%

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	7.37	29.3	46.1	0.06	1.03	2.94	3.97	0.94	0.70	1.64
Mit.	6.76	18.2	48.0	0.06	0.31	2.94	3.26	0.29	0.70	0.99
% Reduced	8%	38%	-4%	—	69%	—	18%	69%	—	40%
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	1.34	5.34	8.42	0.01	0.19	0.54	0.73	0.17	0.13	0.30
Mit.	1.23	3.32	8.76	0.01	0.06	0.54	0.59	0.05	0.13	0.18
% Reduced	8%	38%	-4%	—	69%	—	18%	69%	—	40%

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2025	5.86	42.3	68.3	0.09	1.60	4.17	5.77	1.46	1.00	2.46
2026	5.46	40.7	66.5	0.09	1.44	4.17	5.61	1.32	1.00	2.31
2027	38.0	48.8	78.9	0.12	1.62	4.91	6.52	1.49	1.17	2.66
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2024	0.20	2.10	1.87	0.01	0.05	0.66	0.71	0.05	0.12	0.17
2025	5.85	42.5	65.3	0.09	1.60	4.17	5.77	1.46	1.00	2.46
2026	5.45	40.9	63.9	0.09	1.44	4.17	5.61	1.32	1.00	2.31
2027	5.18	39.3	62.5	0.09	1.26	4.17	5.42	1.16	1.00	2.15
Average Daily	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	0.03	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
2025	2.85	22.5	32.4	0.05	0.83	2.18	3.01	0.76	0.52	1.28
2026	3.89	29.3	46.1	0.06	1.03	2.94	3.97	0.94	0.70	1.64

2027	7.37	13.4	21.1	0.03	0.44	1.35	1.78	0.40	0.32	0.72
Annual	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
2025	0.52	4.10	5.91	0.01	0.15	0.40	0.55	0.14	0.09	0.23
2026	0.71	5.34	8.42	0.01	0.19	0.54	0.73	0.17	0.13	0.30
2027	1.34	2.44	3.84	0.01	0.08	0.25	0.33	0.07	0.06	0.13

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—
2025	3.92	25.7	70.7	0.09	0.50	4.17	4.66	0.45	1.00	1.45
2026	3.64	25.1	69.1	0.09	0.44	4.17	4.61	0.40	1.00	1.40
2027	35.7	28.5	88.6	0.12	0.50	4.91	5.41	0.47	1.17	1.64
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—
2024	0.20	2.10	1.87	0.01	0.04	0.66	0.70	0.04	0.12	0.16
2025	3.90	25.9	67.7	0.09	0.50	4.17	4.66	0.45	1.00	1.45
2026	3.64	25.4	66.5	0.09	0.44	4.17	4.61	0.40	1.00	1.40
2027	3.50	24.9	65.1	0.09	0.38	4.17	4.54	0.35	1.00	1.35
Average Daily	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	0.03	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005
2025	1.84	13.5	33.7	0.05	0.26	2.18	2.44	0.24	0.52	0.76
2026	2.59	18.2	48.0	0.06	0.31	2.94	3.26	0.29	0.70	0.99
2027	6.76	8.07	23.1	0.03	0.13	1.35	1.48	0.13	0.32	0.45
Annual	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

2025	0.34	2.47	6.16	0.01	0.05	0.40	0.45	0.04	0.09	0.14
2026	0.47	3.32	8.76	0.01	0.06	0.54	0.59	0.05	0.13	0.18
2027	1.23	1.47	4.22	0.01	0.02	0.25	0.27	0.02	0.06	0.08

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	15.6	5.05	67.8	0.11	0.16	9.64	9.80	0.16	2.45	2.60
Mit.	15.5	4.23	67.5	0.10	0.09	9.64	9.73	0.09	2.45	2.54
% Reduced	< 0.5%	16%	1%	5%	41%	—	1%	42%	—	3%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	13.1	5.19	41.3	0.10	0.14	9.64	9.78	0.14	2.45	2.59
Mit.	13.0	4.37	40.9	0.10	0.08	9.64	9.71	0.08	2.45	2.52
% Reduced	< 0.5%	16%	1%	5%	46%	—	1%	46%	—	3%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	14.5	5.03	54.8	0.09	0.15	8.47	8.62	0.15	2.15	2.30
Mit.	14.5	4.21	54.4	0.09	0.08	8.47	8.55	0.08	2.15	2.23
% Reduced	< 0.5%	16%	1%	6%	44%	—	1%	45%	—	3%
Annual (Max)	—	—	—	—	—	—	—	—	—	—
Unmit.	2.65	0.92	10.0	0.02	0.03	1.55	1.57	0.03	0.39	0.42
Mit.	2.64	0.77	9.94	0.02	0.02	1.55	1.56	0.01	0.39	0.41
% Reduced	< 0.5%	16%	1%	6%	44%	—	1%	45%	—	3%

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	5.65	3.79	43.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Area	9.88	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Energy	0.06	1.06	0.55	0.01	0.08	—	0.08	0.08	—	0.08
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	15.6	5.05	67.8	0.11	0.16	9.64	9.80	0.16	2.45	2.60
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	5.58	4.14	40.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Area	7.43	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Energy	0.06	1.06	0.55	0.01	0.08	—	0.08	0.08	—	0.08
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	13.1	5.19	41.3	0.10	0.14	9.64	9.78	0.14	2.45	2.59
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	5.35	3.84	38.1	0.09	0.06	8.48	8.54	0.05	2.15	2.21
Area	9.11	0.15	16.1	< 0.005	0.01	—	0.01	0.01	—	0.01
Energy	0.06	1.06	0.55	0.01	0.08	—	0.08	0.08	—	0.08
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—

Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	14.5	5.03	54.8	0.09	0.15	8.47	8.62	0.15	2.15	2.30
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.98	0.70	6.96	0.02	0.01	1.55	1.56	0.01	0.39	0.40
Area	1.66	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	0.01	0.19	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Total	2.65	0.92	10.0	0.02	0.03	1.55	1.57	0.03	0.39	0.42

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Mobile	5.65	3.79	43.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Area	9.88	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Energy	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	15.5	4.23	67.5	0.10	0.09	9.64	9.73	0.09	2.45	2.54
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Mobile	5.58	4.14	40.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Area	7.43	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Energy	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	13.0	4.37	40.9	0.10	0.08	9.64	9.71	0.08	2.45	2.52
Average Daily	—	—	—	—	—	—	—	—	—	—
Mobile	5.35	3.84	38.1	0.09	0.06	8.48	8.54	0.05	2.15	2.21
Area	9.11	0.15	16.1	< 0.005	0.01	—	0.01	0.01	—	0.01
Energy	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Total	14.5	4.21	54.4	0.09	0.08	8.47	8.55	0.08	2.15	2.23
Annual	—	—	—	—	—	—	—	—	—	—
Mobile	0.98	0.70	6.96	0.02	0.01	1.55	1.56	0.01	0.39	0.40
Area	1.66	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Energy	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Water	—	—	—	—	—	—	—	—	—	—
Waste	—	—	—	—	—	—	—	—	—	—
Refrig.	—	—	—	—	—	—	—	—	—	—
Vegetation	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Total	2.64	0.77	9.94	0.02	0.02	1.55	1.56	0.01	0.39	0.41

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.31	1.27	< 0.005	0.05	—	0.05	0.04	—	0.04
Demolition	—	—	—	—	—	0.44	0.44	—	0.07	0.07
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Worker	0.02	0.03	0.32	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.76	0.28	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.2. Demolition (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	1.31	1.27	< 0.005	0.03	—	0.03	0.03	—	0.03
Demolition	—	—	—	—	—	0.44	0.44	—	0.07	0.07
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.03	0.32	0.00	0.00	0.07	0.07	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.76	0.28	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005

3.3. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.19	10.9	11.0	0.03	0.47	—	0.47	0.43	—	0.43
Dust From Material Movement	—	—	—	—	—	0.62	0.62	—	0.07	0.07
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.33	0.33	< 0.005	0.01	—	0.01	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.06	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	5.96	2.25	0.03	0.06	1.25	1.31	0.06	0.34	0.40
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.18	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

3.4. Site Preparation (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.26	1.33	15.0	0.03	0.05	—	0.05	0.05	—	0.05
Dust From Material Movement	—	—	—	—	—	0.62	0.62	—	0.07	0.07
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.04	0.45	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	0.01	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Dust From Material Movement	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.04	0.44	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	5.96	2.25	0.03	0.06	1.25	1.31	0.06	0.34	0.40
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.18	0.07	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005

3.5. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.52	13.1	16.5	0.02	0.60	—	0.60	0.56	—	0.56
Dust From Material Movement	—	—	—	—	—	0.41	0.41	—	0.04	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.52	13.1	16.5	0.02	0.60	—	0.60	0.56	—	0.56
Dust From Material Movement	—	—	—	—	—	0.41	0.41	—	0.04	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.31	2.70	3.40	0.01	0.12	—	0.12	0.11	—	0.11
Dust From Material Movement	—	—	—	—	—	0.09	0.09	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.49	0.62	< 0.005	0.02	—	0.02	0.02	—	0.02
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	1.39	0.00	0.00	0.26	0.26	0.00	0.06	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.07	5.67	2.20	0.03	0.06	1.24	1.29	0.06	0.34	0.40
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.18	0.00	0.00	0.26	0.26	0.00	0.06	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	5.89	2.23	0.03	0.06	1.24	1.29	0.06	0.34	0.40
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.25	0.00	0.00	0.05	0.05	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	1.22	0.46	0.01	0.01	0.25	0.26	0.01	0.07	0.08
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.22	0.08	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01

3.6. Grading (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.68	4.87	17.6	0.02	0.14	—	0.14	0.13	—	0.13
Dust From Material Movement	—	—	—	—	—	0.41	0.41	—	0.04	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.68	4.87	17.6	0.02	0.14	—	0.14	0.13	—	0.13
Dust From Material Movement	—	—	—	—	—	0.41	0.41	—	0.04	0.04
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	1.00	3.61	0.01	0.03	—	0.03	0.03	—	0.03
Dust From Material Movement	—	—	—	—	—	0.09	0.09	—	0.01	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.18	0.66	< 0.005	0.01	—	0.01	0.01	—	0.01
Dust From Material Movement	—	—	—	—	—	0.02	0.02	—	< 0.005	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	1.39	0.00	0.00	0.26	0.26	0.00	0.06	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	5.67	2.20	0.03	0.06	1.24	1.29	0.06	0.34	0.40
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.10	1.18	0.00	0.00	0.26	0.26	0.00	0.06	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.07	5.89	2.23	0.03	0.06	1.24	1.29	0.06	0.34	0.40
Average Daily	—	—	—	—	—	—	—	—	—	—

Worker	0.02	0.02	0.25	0.00	0.00	0.05	0.05	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	1.22	0.46	0.01	0.01	0.25	0.26	0.01	0.07	0.08
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.22	0.08	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.59	39.2	47.6	0.08	1.58	—	1.58	1.45	—	1.45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.59	39.2	47.6	0.08	1.58	—	1.58	1.45	—	1.45
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.92	16.4	19.9	0.03	0.66	—	0.66	0.61	—	0.61
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.35	2.99	3.64	0.01	0.12	—	0.12	0.11	—	0.11

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.22	1.23	19.7	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.94	0.95	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.20	1.36	16.7	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	2.02	0.96	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.50	0.62	7.36	0.00	0.00	1.54	1.54	0.00	0.36	0.36
Vendor	0.02	0.85	0.40	0.01	0.01	0.19	0.20	0.01	0.05	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.11	1.34	0.00	0.00	0.28	0.28	0.00	0.07	0.07
Vendor	< 0.005	0.16	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.65	22.5	50.0	0.08	0.47	—	0.47	0.44	—	0.44

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.65	22.5	50.0	0.08	0.47	—	0.47	0.44	—	0.44
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.11	9.44	20.9	0.03	0.20	—	0.20	0.18	—	0.18
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	1.72	3.82	0.01	0.04	—	0.04	0.03	—	0.03
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.22	1.23	19.7	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.94	0.95	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.20	1.36	16.7	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	2.02	0.96	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.50	0.62	7.36	0.00	0.00	1.54	1.54	0.00	0.36	0.36
Vendor	0.02	0.85	0.40	0.01	0.01	0.19	0.20	0.01	0.05	0.06
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Worker	0.09	0.11	1.34	0.00	0.00	0.28	0.28	0.00	0.07	0.07
Vendor	< 0.005	0.16	0.07	< 0.005	< 0.005	0.03	0.04	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.36	37.7	47.3	0.08	1.42	—	1.42	1.30	—	1.30
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.36	37.7	47.3	0.08	1.42	—	1.42	1.30	—	1.30
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.12	26.9	33.8	0.05	1.01	—	1.01	0.93	—	0.93
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.57	4.92	6.17	0.01	0.18	—	0.18	0.17	—	0.17
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.04	1.10	18.3	0.00	0.00	3.71	3.71	0.00	0.87	0.87

Vendor	0.05	1.85	0.89	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.04	1.23	15.6	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.93	0.92	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.74	0.96	11.7	0.00	0.00	2.62	2.62	0.00	0.61	0.61
Vendor	0.04	1.39	0.65	0.01	0.02	0.33	0.34	0.01	0.09	0.10
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.18	2.13	0.00	0.00	0.48	0.48	0.00	0.11	0.11
Vendor	0.01	0.25	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2026) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.55	22.2	49.9	0.08	0.42	—	0.42	0.39	—	0.39
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.55	22.2	49.9	0.08	0.42	—	0.42	0.39	—	0.39

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.82	15.8	35.7	0.05	0.30	—	0.30	0.28	—	0.28
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	2.89	6.51	0.01	0.05	—	0.05	0.05	—	0.05
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.04	1.10	18.3	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.85	0.89	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.04	1.23	15.6	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.93	0.92	0.01	0.02	0.46	0.48	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.74	0.96	11.7	0.00	0.00	2.62	2.62	0.00	0.61	0.61
Vendor	0.04	1.39	0.65	0.01	0.02	0.33	0.34	0.01	0.09	0.10
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.18	2.13	0.00	0.00	0.48	0.48	0.00	0.11	0.11
Vendor	0.01	0.25	0.12	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.15	36.2	47.2	0.08	1.24	—	1.24	1.14	—	1.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.15	36.2	47.2	0.08	1.24	—	1.24	1.14	—	1.14
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.22	10.7	13.9	0.02	0.37	—	0.37	0.34	—	0.34
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	1.95	2.54	< 0.005	0.07	—	0.07	0.06	—	0.06
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.01	0.98	17.0	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.77	0.84	0.01	0.01	0.46	0.47	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Worker	0.99	1.22	14.4	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.84	0.86	0.01	0.01	0.46	0.47	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.36	4.48	0.00	0.00	1.08	1.08	0.00	0.25	0.25
Vendor	0.01	0.55	0.25	< 0.005	< 0.005	0.13	0.14	< 0.005	0.04	0.04
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05
Vendor	< 0.005	0.10	0.05	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.46	21.8	49.8	0.08	0.36	—	0.36	0.34	—	0.34
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.46	21.8	49.8	0.08	0.36	—	0.36	0.34	—	0.34
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	6.45	14.7	0.02	0.11	—	0.11	0.10	—	0.10

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	1.18	2.69	< 0.005	0.02	—	0.02	0.02	—	0.02
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	1.01	0.98	17.0	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.77	0.84	0.01	0.01	0.46	0.47	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.99	1.22	14.4	0.00	0.00	3.71	3.71	0.00	0.87	0.87
Vendor	0.05	1.84	0.86	0.01	0.01	0.46	0.47	0.01	0.13	0.14
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.29	0.36	4.48	0.00	0.00	1.08	1.08	0.00	0.25	0.25
Vendor	0.01	0.55	0.25	< 0.005	< 0.005	0.13	0.14	< 0.005	0.04	0.04
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.07	0.82	0.00	0.00	0.20	0.20	0.00	0.05	0.05
Vendor	< 0.005	0.10	0.05	< 0.005	< 0.005	0.02	0.03	< 0.005	0.01	0.01
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
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Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.19	9.63	10.4	0.03	0.36	—	0.36	0.33	—	0.33
Architectural Coatings	31.4	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.21	1.72	1.85	0.01	0.06	—	0.06	0.06	—	0.06
Architectural Coatings	5.59	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.31	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01
Architectural Coatings	1.02	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.20	3.41	0.00	0.00	0.74	0.74	0.00	0.17	0.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.04	0.54	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	3.70	17.5	0.03	0.12	—	0.12	0.12	—	0.12
Architectural Coatings	31.4	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.66	3.12	0.01	0.02	—	0.02	0.02	—	0.02
Architectural Coatings	5.59	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.12	0.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

Architectural Coatings	1.02	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.20	0.20	3.41	0.00	0.00	0.74	0.74	0.00	0.17	0.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.54	0.00	0.00	0.13	0.13	0.00	0.03	0.03
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.10	0.00	0.00	0.02	0.02	0.00	0.01	0.01
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Trenching (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	2.44	2.64	< 0.005	0.10	—	0.10	0.09	—	0.09
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.16	< 0.005	0.01	—	0.01	0.01	—	0.01
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.16. Trenching (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Onsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	2.44	2.64	< 0.005	0.08	—	0.08	0.08	—	0.08
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.15	0.16	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.52	0.00	0.00	0.10	0.10	0.00	0.02	0.02
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.36	2.88	33.1	0.08	0.05	7.24	7.29	0.05	1.84	1.88
High Turnover (Sit Down Restaurant)	1.29	0.91	10.7	0.03	0.02	2.40	2.42	0.01	0.61	0.63
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.65	3.79	43.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.30	3.14	30.9	0.07	0.05	7.24	7.29	0.05	1.84	1.88
High Turnover (Sit Down Restaurant)	1.28	1.00	9.86	0.02	0.02	2.40	2.42	0.01	0.61	0.63
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total	5.58	4.14	40.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.77	0.57	5.68	0.01	0.01	1.29	1.30	0.01	0.33	0.34
High Turnover (Sit Down Restaurant)	0.21	0.13	1.27	< 0.005	< 0.005	0.26	0.26	< 0.005	0.07	0.07
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.98	0.70	6.96	0.02	0.01	1.55	1.56	0.01	0.39	0.40

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.36	2.88	33.1	0.08	0.05	7.24	7.29	0.05	1.84	1.88
High Turnover (Sit Down Restaurant)	1.29	0.91	10.7	0.03	0.02	2.40	2.42	0.01	0.61	0.63
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.65	3.79	43.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.30	3.14	30.9	0.07	0.05	7.24	7.29	0.05	1.84	1.88
High Turnover (Sit Down Restaurant)	1.28	1.00	9.86	0.02	0.02	2.40	2.42	0.01	0.61	0.63

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	5.58	4.14	40.7	0.10	0.06	9.64	9.71	0.06	2.45	2.51
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.77	0.57	5.68	0.01	0.01	1.29	1.30	0.01	0.33	0.34
High Turnover (Sit Down Restaurant)	0.21	0.13	1.27	< 0.005	< 0.005	0.26	0.26	< 0.005	0.07	0.07
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.98	0.70	6.96	0.02	0.01	1.55	1.56	0.01	0.39	0.40

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.05	0.82	0.35	0.01	0.07	—	0.07	0.07	—	0.07
High Turnover (Sit Down Restaurant)	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02

Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.06	1.06	0.55	0.01	0.08	—	0.08	0.08	—	0.08
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.05	0.82	0.35	0.01	0.07	—	0.07	0.07	—	0.07
High Turnover (Sit Down Restaurant)	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.06	1.06	0.55	0.01	0.08	—	0.08	0.08	—	0.08
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.01	0.15	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01
High Turnover (Sit Down Restaurant)	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.19	0.10	< 0.005	0.02	—	0.02	0.02	—	0.02

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00

High Turnover (Sit Down Restaurant)	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurant)	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	0.01	0.24	0.20	< 0.005	0.02	—	0.02	0.02	—	0.02
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
High Turnover (Sit Down Restaurant)	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Total	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	6.88	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.56	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.45	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Total	9.88	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	6.88	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.56	—	—	—	—	—	—	—	—	—
Total	7.43	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	1.25	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.31	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.66	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	6.88	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.56	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.45	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Total	9.88	0.22	23.6	< 0.005	0.02	—	0.02	0.01	—	0.01
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	6.88	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.56	—	—	—	—	—	—	—	—	—
Total	7.43	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00
Consumer Products	1.25	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.31	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005
Total	1.66	0.03	2.94	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—

Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—

Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—

High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Enclosed Parking with Elevator	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—
High Turnover (Sit Down Restaurant)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	> -0.005	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Subtotal	> -0.005	-0.01	—	> -0.005	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—
Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—

Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—
Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	> -0.005	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Subtotal	> -0.005	-0.01	—	> -0.005	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—
Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—
Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—
Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

Subtotal	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—
Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—
Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—
Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—
-------	---	---	---	---	---	---	---	---	---	---

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	> -0.005	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Subtotal	> -0.005	-0.01	—	> -0.005	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—

Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—
Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—
Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	> -0.005	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Subtotal	> -0.005	-0.01	—	> -0.005	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—
Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—
Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—

Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	-0.01	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	-0.02	—	-0.01	-0.01	-0.01	-0.01	> -0.005	> -0.005	> -0.005
Annual	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	< 0.005	—	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Oklahoma Texas Redbud	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

Saratoga Hybrid Laurel	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Subtotal	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Sequestered	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	—	—	—	—	—	—	—	—	—
Orange Wattle	—	—	—	—	—	—	—	—	—	—
Marina Strawberry Tree	—	—	—	—	—	—	—	—	—	—
Oklahoma Texas Redbud	—	—	—	—	—	—	—	—	—	—
Australian Willow	—	—	—	—	—	—	—	—	—	—
Saratoga Hybrid Laurel	—	—	—	—	—	—	—	—	—	—
Olive	—	—	—	—	—	—	—	—	—	—
Fruitless Olive	—	—	—	—	—	—	—	—	—	—
Catalina Cherry	—	—	—	—	—	—	—	—	—	—
Coast Live Oak	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—
Mexican Fan Palsm	—	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Orange Wattle	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Marina Strawberry Tree	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

Oklahoma Texas Redbud	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Australian Willow	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Saratoga Hybrid Laurel	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fruitless Olive	—	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Catalina Cherry	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
Coast Live Oak	—	> -0.005	—	> -0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Subtotal	—	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005
—	—	—	—	—	—	—	—	—	—	—
Total	> -0.005	> -0.005	—	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005	> -0.005

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	12/24/2024	12/31/2024	5.00	6.00	—
Site Preparation	Site Preparation	1/1/2025	1/15/2025	5.00	11.0	—
Grading	Grading	1/16/2025	4/30/2025	5.00	75.0	—
Building Construction	Building Construction	6/1/2025	5/31/2027	5.00	521	—
Architectural Coating	Architectural Coating	4/1/2027	6/30/2027	5.00	65.0	—
Trenching	Trenching	5/1/2025	5/31/2025	5.00	22.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Demolition	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Grading	Graders	Diesel	Average	2.00	8.00	148	0.41
Grading	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Grading	Bore/Drill Rigs	Diesel	Average	1.00	8.00	83.0	0.50
Grading	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Grading	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Other Construction Equipment	Diesel	Average	1.00	8.00	82.0	0.42
Building Construction	Cranes	Diesel	Average	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	2.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Building Construction	Air Compressors	Diesel	Average	4.00	8.00	37.0	0.48
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Concrete/Industrial Saws	Diesel	Average	2.00	8.00	33.0	0.73
Building Construction	Dumpers/Tenders	Diesel	Average	3.00	8.00	16.0	0.38

Building Construction	Other Construction Equipment	Diesel	Average	5.00	8.00	82.0	0.42
Building Construction	Other General Industrial Equipment	Diesel	Average	6.00	8.00	35.0	0.34
Building Construction	Other Material Handling Equipment	Diesel	Average	3.00	8.00	93.0	0.40
Building Construction	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Building Construction	Skid Steer Loaders	Diesel	Average	1.00	8.00	71.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Pressure Washers	Diesel	Average	1.00	8.00	14.0	0.30
Architectural Coating	Scrapers	Diesel	Average	1.00	8.00	423	0.48
Architectural Coating	Surfacing Equipment	Diesel	Average	1.00	8.00	399	0.30
Architectural Coating	Sweepers/Scrubbers	Diesel	Average	1.00	8.00	36.0	0.46
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
Trenching	Dumpers/Tenders	Diesel	Average	1.00	8.00	14.0	0.30
Trenching	Excavators	Diesel	Average	1.00	8.00	36.0	0.38

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Dumpers/Tenders	Diesel	Average	1.00	8.00	16.0	0.38
Demolition	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Site Preparation	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Site Preparation	Scrapers	Diesel	Tier 4 Final	1.00	8.00	423	0.48
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	7.00	84.0	0.37
Grading	Graders	Diesel	Tier 4 Final	2.00	8.00	148	0.41
Grading	Air Compressors	Diesel	Average	1.00	8.00	37.0	0.48
Grading	Bore/Drill Rigs	Diesel	Tier 4 Final	1.00	8.00	83.0	0.50

Grading	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Grading	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Other Construction Equipment	Diesel	Tier 4 Final	1.00	8.00	82.0	0.42
Building Construction	Cranes	Diesel	Tier 4 Final	1.00	8.00	367	0.29
Building Construction	Forklifts	Diesel	Tier 4 Final	1.00	7.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	2.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Building Construction	Air Compressors	Diesel	Average	4.00	8.00	37.0	0.48
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Concrete/Industrial Saws	Diesel	Average	2.00	8.00	33.0	0.73
Building Construction	Dumpers/Tenders	Diesel	Average	3.00	8.00	16.0	0.38
Building Construction	Other Construction Equipment	Diesel	Tier 4 Final	5.00	8.00	82.0	0.42
Building Construction	Other General Industrial Equipment	Diesel	Tier 4 Final	6.00	8.00	35.0	0.34
Building Construction	Other Material Handling Equipment	Diesel	Tier 4 Final	3.00	8.00	93.0	0.40
Building Construction	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Building Construction	Skid Steer Loaders	Diesel	Tier 4 Final	1.00	8.00	71.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48
Architectural Coating	Pressure Washers	Diesel	Average	1.00	8.00	14.0	0.30
Architectural Coating	Scrapers	Diesel	Tier 4 Final	1.00	8.00	423	0.48
Architectural Coating	Surfacing Equipment	Diesel	Tier 4 Final	1.00	8.00	399	0.30

Architectural Coating	Sweepers/Scrubbers	Diesel	Average	1.00	8.00	36.0	0.46
Trenching	Trenchers	Diesel	Average	1.00	8.00	40.0	0.50
Trenching	Dumpers/Tenders	Diesel	Average	1.00	8.00	14.0	0.30
Trenching	Excavators	Diesel	Average	1.00	8.00	36.0	0.38

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	5.00	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	8.33	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	67.5	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	66.7	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	284	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	53.7	10.2	HHDT,MHDT

Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	56.7	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	7.50	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	5.00	18.5	LDA,LDT1,LDT2
Demolition	Vendor	—	10.2	HHDT,MHDT
Demolition	Hauling	8.33	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	67.5	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	18.5	LDA,LDT1,LDT2

Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	66.7	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	284	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	53.7	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	56.7	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT
Trenching	—	—	—	—
Trenching	Worker	7.50	18.5	LDA,LDT1,LDT2
Trenching	Vendor	—	10.2	HHDT,MHDT
Trenching	Hauling	0.00	20.0	HHDT
Trenching	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	631,472	210,491	14,193	4,731	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	200	—
Site Preparation	—	5,936	16.5	0.00	—
Grading	—	40,000	75.0	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%
High Turnover (Sit Down Restaurant)	0.00	0%
Enclosed Parking with Elevator	0.00	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	690	0.05	0.01
2025	0.00	690	0.05	0.01
2026	0.00	690	0.05	0.01

2027	0.00	690	0.05	0.01
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5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	1,439	1,373	1,373	518,342	10,206	9,742	9,742	3,676,943
High Turnover (Sit Down Restaurant)	416	378	378	148,013	1,458	3,390	3,390	733,761
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	1,439	1,373	1,373	518,342	10,206	9,742	9,742	3,676,943
High Turnover (Sit Down Restaurant)	416	378	378	148,013	1,458	3,390	3,390	733,761
Enclosed Parking with Elevator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0

Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	327
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.1.2. Mitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	327
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
631471.95	210,491	14,193	4,731	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	250

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	1,073,702	690	0.0489	0.0069	3,245,592
High Turnover (Sit Down Restaurant)	308,178	690	0.0489	0.0069	896,332
Enclosed Parking with Elevator	388,339	690	0.0489	0.0069	0.00

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	1,075,143	690	0.0489	0.0069	0.00
High Turnover (Sit Down Restaurant)	308,178	690	0.0489	0.0069	896,332
Enclosed Parking with Elevator	388,339	690	0.0489	0.0069	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	12,188,533	635,851
High Turnover (Sit Down Restaurant)	2,872,036	0.00
Enclosed Parking with Elevator	0.00	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	12,188,533	635,851
High Turnover (Sit Down Restaurant)	2,872,036	0.00
Enclosed Parking with Elevator	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	193	—
High Turnover (Sit Down Restaurant)	113	—
Enclosed Parking with Elevator	0.00	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	193	—
High Turnover (Sit Down Restaurant)	113	—

Enclosed Parking with Elevator	0.00	—
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5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
High Turnover (Sit Down Restaurant)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
High Turnover (Sit Down Restaurant)	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
High Turnover (Sit Down Restaurant)	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
Orange Wattle	8.00	17,003	85.0
Marina Strawberry Tree	14.0	27,228	133
Oklahoma Texas Redbud	15.0	21,429	96.0
Australian Willow	14.0	7,085	30.0
Saratoga Hybrid Laurel	15.0	21,252	106
Olive	1.00	5,193	24.0
Fruitless Olive	2.00	0.00	0.00
Catalina Cherry	12.0	25,490	127
Coast Live Oak	1.00	21,967	107
Mexican Fan Palm	-9.00	5,779	22.0

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
Orange Wattle	8.00	17,003	85.0
Marina Strawberry Tree	14.0	27,228	133
Oklahoma Texas Redbud	15.0	21,429	96.0
Australian Willow	14.0	7,085	30.0
Saratoga Hybrid Laurel	15.0	21,252	106
Olive	1.00	5,193	24.0
Fruitless Olive	2.00	0.00	0.00
Catalina Cherry	12.0	25,490	127
Coast Live Oak	1.00	21,967	107
Mexican Fan Palm	-9.00	5,779	22.0

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	9.58	annual days of extreme heat
Extreme Precipitation	6.70	annual days with precipitation above 20 mm
Sea Level Rise	0.00	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events.

Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A

Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	57.0
AQ-PM	90.4
AQ-DPM	90.9
Drinking Water	92.5
Lead Risk Housing	83.5
Pesticides	0.00
Toxic Releases	76.8
Traffic	92.2
Effect Indicators	—
CleanUp Sites	54.3
Groundwater	59.6
Haz Waste Facilities/Generators	54.6
Impaired Water Bodies	66.7

Solid Waste	24.8
Sensitive Population	—
Asthma	63.7
Cardio-vascular	60.6
Low Birth Weights	43.1
Socioeconomic Factor Indicators	—
Education	66.1
Housing	65.2
Linguistic	75.2
Poverty	33.5
Unemployment	60.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	38.44475812
Employed	72.42397023
Median HI	50.67368151
Education	—
Bachelor's or higher	67.68895162
High school enrollment	100
Preschool enrollment	74.72090337
Transportation	—
Auto Access	22.93083537
Active commuting	86.88566662
Social	—

2-parent households	32.15706403
Voting	56.82022328
Neighborhood	—
Alcohol availability	9.624021558
Park access	81.35506224
Retail density	29.39817785
Supermarket access	73.02707558
Tree canopy	89.50340049
Housing	—
Homeownership	15.33427435
Housing habitability	17.64403952
Low-inc homeowner severe housing cost burden	6.557166688
Low-inc renter severe housing cost burden	42.98729629
Uncrowded housing	50.73784165
Health Outcomes	—
Insured adults	21.67329655
Arthritis	86.1
Asthma ER Admissions	40.8
High Blood Pressure	84.3
Cancer (excluding skin)	71.8
Asthma	65.7
Coronary Heart Disease	74.7
Chronic Obstructive Pulmonary Disease	71.2
Diagnosed Diabetes	57.0
Life Expectancy at Birth	64.6
Cognitively Disabled	56.3
Physically Disabled	77.4

Heart Attack ER Admissions	57.0
Mental Health Not Good	48.5
Chronic Kidney Disease	73.0
Obesity	54.6
Pedestrian Injuries	59.1
Physical Health Not Good	50.9
Stroke	75.8
Health Risk Behaviors	—
Binge Drinking	35.4
Current Smoker	47.6
No Leisure Time for Physical Activity	54.1
Climate Change Exposures	—
Wildfire Risk	53.8
SLR Inundation Area	0.0
Children	83.0
Elderly	57.3
English Speaking	18.0
Foreign-born	82.0
Outdoor Workers	80.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	51.0
Traffic Density	58.5
Traffic Access	87.4
Other Indices	—
Hardship	46.5
Other Decision Support	—
2016 Voting	38.6

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	86.0
Healthy Places Index Score for Project Location (b)	53.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Project plans. Population derived from Fehr & Peers, Draft Transportation Assessment – Sunset + Everett Project; July 2023. Estimates from City of Los Angeles VMT Calculator, version 1.3.
Construction: Construction Phases	Developer information
Construction: Off-Road Equipment	Developer information
Construction: Trips and VMT	Assumes 10 CY haul truck capacity
Operations: Hearths	Project plans
Operations: Vehicle Data	—

ATTACHMENT D

Dispersion Model Input and Summary Output Files

**BEE-Line Software: (Version 12.10) data input file
** Model: AERMOD.EXE Input File Creation Date: 5/14/2024 Time: 12:00:54 PM
NO ECHO

CO STARTING
CO TITLEONE Sunset and Everett
CO TITLETWO Diesel Particulates / Demolition_Site Preparation_Grading
CO MODELOPT DFAULT CONC NODRYDPLT NOWETDPLT
CO AVERTIME ANNUAL
CO URBANOPT 9818605 LOS_ANGELES 1.0
CO POLLUTID OTHER
CO RUNORNOT RUN
CO FINISHED

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SO LOCATION C_331 VOLUME 384645. 3770580. 134.12
SO SRCPARAM C_331 5.0195E-06 5. 2.32 1.4
SO LOCATION C_332 VOLUME 384650. 3770580. 136.39
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SO LOCATION C_333 VOLUME 384655. 3770580. 139.73
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SO LOCATION C_334 VOLUME 384660. 3770580. 143.63
SO SRCPARAM C_334 5.0195E-06 5. 2.32 1.4
SO LOCATION C_335 VOLUME 384665. 3770580. 145.37
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SO LOCATION C_336 VOLUME 384670. 3770580. 146.76
SO SRCPARAM C_336 5.0195E-06 5. 2.32 1.4
SO LOCATION C_337 VOLUME 384675. 3770580. 147.45
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SO LOCATION C_338 VOLUME 384680. 3770580. 147.96
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SO LOCATION C_339 VOLUME 384685. 3770580. 148.31
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SO LOCATION C_340 VOLUME 384630. 3770585. 131.61
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SO LOCATION C_363 VOLUME 384684.85 3770590. 148.99
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SO LOCATION C_366 VOLUME 384640. 3770595. 135.86
SO SRCPARAM C_366 5.0195E-06 5. 2.32 1.4
SO LOCATION C_367 VOLUME 384645. 3770595. 137.56

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[illegible]

[illegible]

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RE DISCCART	384736.00	3770350.00	128.37	183.69
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RE DISCCART	384608.00	3770470.00	128.77	183.69
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RE DISCCART	384710.88	3770477.27	138.30	183.69
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RE DISCCART	384560.88	3770486.02	137.24	183.69
RE DISCCART	384568.00	3770486.00	133.57	183.69
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RE DISCCART	384584.00	3770486.00	130.91	183.69
RE DISCCART	384592.00	3770486.00	130.63	183.69
RE DISCCART	384600.00	3770486.00	129.50	183.69
RE DISCCART	384608.00	3770486.00	127.89	183.69
RE DISCCART	384684.00	3770486.00	138.85	183.69
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RE DISCCART	384560.00	3770494.00	137.37	183.69
RE DISCCART	384568.00	3770494.00	133.97	183.69
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RE DISCCART	384584.00	3770494.00	131.06	183.69
RE DISCCART	384592.00	3770494.00	130.82	183.69
RE DISCCART	384600.00	3770494.00	129.64	183.69
RE DISCCART	384608.00	3770494.00	128.02	183.69
RE DISCCART	384684.80	3770493.90	140.45	183.69
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RE DISCCART	384702.54	3770493.52	140.44	183.69
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RE DISCCART	384728.00	3770494.00	141.21	183.69
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RE DISCCART	384584.00	3770502.00	132.92	183.69
RE DISCCART	384592.00	3770502.00	130.70	183.69
RE DISCCART	384600.00	3770502.00	129.09	183.69
RE DISCCART	384607.50	3770502.00	128.22	183.69

RE DISCCART	384685.60	3770502.00	141.24	183.69
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RE DISCCART	384728.00	3770502.00	142.84	183.69
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RE DISCCART	384568.00	3770510.00	138.92	183.69
RE DISCCART	384576.00	3770510.00	135.68	183.69
RE DISCCART	384584.00	3770510.00	133.93	183.69
RE DISCCART	384592.00	3770510.00	131.67	183.69
RE DISCCART	384600.00	3770510.00	129.42	183.69
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RE DISCCART	384703.38	3770509.77	143.56	183.69
RE DISCCART	384712.00	3770510.00	144.04	183.69
RE DISCCART	384720.00	3770510.00	144.27	183.69
RE DISCCART	384728.00	3770510.00	144.16	183.69
RE DISCCART	384554.21	3770518.10	142.98	181.70
RE DISCCART	384560.00	3770518.00	141.92	182.82
RE DISCCART	384568.00	3770518.00	139.32	183.69
RE DISCCART	384576.00	3770518.00	136.18	183.69
RE DISCCART	384584.00	3770518.00	133.74	183.69
RE DISCCART	384592.00	3770518.00	132.63	183.69
RE DISCCART	384600.00	3770518.00	129.91	183.69
RE DISCCART	384695.00	3770518.00	144.87	183.69
RE DISCCART	384704.00	3770518.00	144.97	183.69
RE DISCCART	384712.00	3770518.00	145.19	183.69
RE DISCCART	384720.00	3770518.00	145.25	183.69
RE DISCCART	384728.00	3770518.00	145.22	183.69
RE DISCCART	384552.50	3770526.00	144.08	145.66
RE DISCCART	384560.00	3770526.00	141.09	183.38
RE DISCCART	384568.00	3770526.00	137.48	183.69
RE DISCCART	384576.00	3770526.00	134.51	183.69
RE DISCCART	384584.00	3770526.00	132.64	183.69
RE DISCCART	384592.00	3770526.00	132.07	183.69
RE DISCCART	384600.00	3770526.00	129.62	183.69
RE DISCCART	384687.70	3770525.60	145.11	183.69
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RE DISCCART	384704.00	3770526.00	146.08	183.69
RE DISCCART	384712.00	3770526.00	146.06	183.69
RE DISCCART	384720.00	3770526.00	146.03	183.69
RE DISCCART	384728.00	3770526.00	146.19	183.69
RE DISCCART	384736.00	3770526.00	144.50	183.69
RE DISCCART	384552.00	3770534.00	144.45	145.66
RE DISCCART	384560.00	3770534.00	141.25	183.38
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RE DISCCART	384576.00	3770534.00	133.02	183.69
RE DISCCART	384584.00	3770534.00	132.17	183.69
RE DISCCART	384592.00	3770534.00	131.19	183.69
RE DISCCART	384600.00	3770534.00	129.29	183.69
RE DISCCART	384688.10	3770533.50	146.56	183.69
RE DISCCART	384695.46	3770533.52	147.72	183.69
RE DISCCART	384704.00	3770534.00	148.10	183.69
RE DISCCART	384712.00	3770534.00	147.89	183.69
RE DISCCART	384720.00	3770534.00	147.56	183.69
RE DISCCART	384728.00	3770534.00	147.38	183.69
RE DISCCART	384736.00	3770534.00	146.12	183.69
RE DISCCART	384552.00	3770542.00	144.31	181.44
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RE DISCCART	384576.00	3770542.00	133.16	183.69
RE DISCCART	384584.00	3770542.00	132.51	183.69
RE DISCCART	384592.00	3770542.00	131.25	183.69
RE DISCCART	384600.00	3770542.00	129.30	183.69
RE DISCCART	384689.00	3770542.00	147.82	183.69
RE DISCCART	384696.00	3770542.00	148.38	183.69
RE DISCCART	384704.00	3770542.00	148.64	183.69
RE DISCCART	384712.00	3770542.00	149.01	183.69
RE DISCCART	384720.00	3770542.00	148.87	183.69
RE DISCCART	384728.00	3770542.00	148.48	183.69
RE DISCCART	384736.00	3770542.00	148.17	183.69
RE DISCCART	384552.00	3770550.00	144.28	181.70
RE DISCCART	384560.00	3770550.00	140.94	183.38

RE DISCCART	384568.00	3770550.00	137.34	183.69
RE DISCCART	384576.00	3770550.00	134.27	183.69
RE DISCCART	384584.00	3770550.00	133.40	183.69
RE DISCCART	384592.00	3770550.00	131.76	183.69
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RE DISCCART	384696.00	3770550.00	149.27	183.69
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RE DISCCART	384728.00	3770550.00	149.47	183.69
RE DISCCART	384736.00	3770550.00	149.38	183.69
RE DISCCART	384742.13	3770549.77	148.68	183.69
RE DISCCART	384552.00	3770558.00	144.54	181.70
RE DISCCART	384560.00	3770558.00	141.44	183.38
RE DISCCART	384568.00	3770558.00	138.46	183.69
RE DISCCART	384576.00	3770558.00	135.80	183.69
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RE DISCCART	384704.00	3770558.00	150.39	183.69
RE DISCCART	384712.00	3770558.00	150.50	183.69
RE DISCCART	384720.00	3770558.00	150.55	183.69
RE DISCCART	384728.00	3770558.00	150.63	183.69
RE DISCCART	384736.00	3770558.00	150.40	183.69
RE DISCCART	384744.00	3770558.00	149.61	183.69
RE DISCCART	384552.00	3770566.00	144.77	181.70
RE DISCCART	384560.00	3770566.00	141.86	183.38
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RE DISCCART	384576.00	3770566.00	137.07	183.69
RE DISCCART	384584.00	3770566.00	134.97	183.69
RE DISCCART	384592.00	3770566.00	132.45	183.69
RE DISCCART	384598.50	3770566.00	130.36	183.69
RE DISCCART	384690.20	3770566.00	149.71	183.69
RE DISCCART	384696.30	3770566.00	150.95	183.69
RE DISCCART	384704.00	3770566.00	151.19	183.69
RE DISCCART	384712.00	3770566.00	151.55	183.69
RE DISCCART	384720.00	3770566.00	151.80	183.69
RE DISCCART	384728.00	3770566.00	152.08	183.69
RE DISCCART	384736.00	3770566.00	151.71	183.69
RE DISCCART	384744.00	3770566.00	150.85	183.69
RE DISCCART	384552.00	3770574.00	144.84	181.70
RE DISCCART	384560.00	3770574.00	142.02	183.38
RE DISCCART	384568.00	3770574.00	139.84	183.69
RE DISCCART	384576.00	3770574.00	137.44	183.69
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RE DISCCART	384592.00	3770574.00	132.93	183.69
RE DISCCART	384598.40	3770574.00	130.69	183.69
RE DISCCART	384691.00	3770574.00	150.71	183.69
RE DISCCART	384696.70	3770574.00	152.45	183.69
RE DISCCART	384704.00	3770574.00	152.77	183.69
RE DISCCART	384712.00	3770574.00	153.42	183.69
RE DISCCART	384720.00	3770574.00	153.53	183.69
RE DISCCART	384728.00	3770574.00	153.38	183.69
RE DISCCART	384736.00	3770574.00	153.34	183.69
RE DISCCART	384744.00	3770574.00	152.18	183.69
RE DISCCART	384552.00	3770582.00	145.21	181.70
RE DISCCART	384560.00	3770582.00	142.28	183.38
RE DISCCART	384568.00	3770582.00	140.09	183.69
RE DISCCART	384576.00	3770582.00	137.71	183.69
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RE DISCCART	384592.00	3770582.00	133.31	183.69
RE DISCCART	384598.40	3770582.00	130.95	183.69
RE DISCCART	384691.50	3770582.00	151.37	183.69
RE DISCCART	384697.00	3770582.00	153.22	183.69
RE DISCCART	384704.00	3770582.00	153.93	183.69
RE DISCCART	384712.00	3770582.00	154.34	183.69
RE DISCCART	384720.00	3770582.00	154.68	183.69
RE DISCCART	384728.00	3770582.00	154.47	183.69
RE DISCCART	384736.00	3770582.00	154.28	183.69
RE DISCCART	384744.00	3770582.00	153.31	183.69
RE DISCCART	384552.00	3770590.00	145.74	181.70
RE DISCCART	384560.00	3770590.00	142.63	183.38

RE DISCCART	384568.00	3770590.00	140.31	183.69
RE DISCCART	384576.00	3770590.00	138.07	183.69
RE DISCCART	384584.00	3770590.00	135.76	183.69
RE DISCCART	384592.00	3770590.00	133.61	183.69
RE DISCCART	384598.40	3770590.00	131.18	183.69
RE DISCCART	384691.90	3770590.20	152.12	183.69
RE DISCCART	384697.00	3770590.00	153.88	183.69
RE DISCCART	384704.00	3770590.00	154.93	183.69
RE DISCCART	384712.00	3770590.00	155.08	183.69
RE DISCCART	384720.00	3770590.00	155.32	183.69
RE DISCCART	384728.00	3770590.00	155.17	183.69
RE DISCCART	384736.00	3770590.00	154.96	183.69
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RE DISCCART	384704.00	3770598.00	155.77	183.50
RE DISCCART	384712.00	3770598.00	155.97	183.69
RE DISCCART	384720.00	3770598.00	155.97	183.69
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RE DISCCART	384656.00	3770606.00	141.40	183.69
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RE DISCCART	384672.00	3770606.00	146.91	183.69
RE DISCCART	384680.00	3770606.00	149.37	183.69
RE DISCCART	384688.00	3770606.00	152.25	183.69
RE DISCCART	384696.00	3770606.00	155.08	183.69
RE DISCCART	384704.00	3770606.00	156.32	183.38
RE DISCCART	384712.00	3770606.00	157.10	183.38
RE DISCCART	384720.00	3770606.00	157.56	183.50
RE DISCCART	384728.00	3770606.00	157.80	183.69
RE DISCCART	384736.00	3770606.00	157.77	183.69
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RE DISCCART	384576.00	3770614.00	135.07	183.69
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RE DISCCART	384598.40	3770614.00	131.43	183.69
RE DISCCART	384640.50	3770614.00	136.09	183.69
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RE DISCCART	384680.00	3770614.00	149.49	183.69
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RE DISCCART	384584.00	3770622.00	134.43	183.69

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RE DISCCART 384720.00 3770622.00 158.56 183.38
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RE DISCCART 384704.00 3770630.00 157.22 183.38
RE DISCCART 384712.00 3770630.00 158.34 183.38
RE DISCCART 384720.00 3770630.00 159.61 183.38
RE DISCCART 384728.00 3770630.00 159.61 183.38
RE DISCCART 384736.00 3770630.00 160.04 183.50
RE DISCCART 384744.00 3770630.00 160.34 183.69
RE DISCCART 384703.79 3770636.02 157.92 183.38
RE DISCCART 384712.13 3770636.44 159.46 183.38
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RE DISCCART 384727.96 3770637.27 161.06 183.38
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ME SURFDATA 99999 2010

ME UAIRDATA 3190 2010

ME SITEDATA 99999 2010-2016

ME PROFBASE 87 METERS

ME FINISHED

OU STARTING

OU PLOTFILE ANNUAL ALL "E:\WD Passport\sunset_everett\model\SETUP1_2010-2016_OTHER.GRF" 31

OU SUMMFILE "E:\WD Passport\sunset_everett\model\SETUP1_2010-2016_OTHER.SUM"

OU FINISHED

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Demolition_Site Preparation_Grading *** 12:00:57
*** *** *** *** *** PAGE 1

*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:

- * Model Uses Regulatory DEFAULT Options
- * Model Is Setup For Calculation of Average CONCentration Values.
- * NO GAS DEPOSITION Data Provided.
- * NO PARTICLE DEPOSITION Data Provided.
- * Model Uses NO DRY DEPLETION. DDPLETE = F
- * Model Uses NO WET DEPLETION. WETDPLT = F
- * Stack-tip Downwash.
- * Model Accounts for ELEVated Terrain Effects.
- * Use Calms Processing Routine.
- * Use Missing Data Processing Routine.
- * No Exponential Decay.
- * Model Uses URBAN Dispersion Algorithm for the SBL for 383 Source(s),
 for Total of 1 Urban Area(s):
Urban Population = 9818605.0 ; Urban Roughness Length = 1.000 m
- * Urban Roughness Length of 1.0 Meter Used.
- * ADJ_U* - Use ADJ_U* option for SBL in AERMET
- * TEMP_Sub - Meteorological data includes TEMP substitutions
- * Model Assumes No FLAGPOLE Receptor Heights.
- * The User Specified a Pollutant Type of: OTHER

**Model Calculates ANNUAL Averages Only

**This Run Includes: 383 Source(s); 1 Source Group(s); and 516 Receptor(s)

with: 0 POINT(s), including
 0 POINTCAP(s) and 0 POINTHOR(s)
and: 383 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNNING After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
 m for Missing Hours
 b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 87.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
 Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.10000E+07
 Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.8 MB of RAM.

**Input Runstream File: E:\WD Passport\sunset_everett\model\SETUP1_2010-2016_OTHER.DTA

**Output Print File: E:\WD Passport\sunset_everett\model\SETUP1_2010-2016_OTHER.LST

**File for Summary of Results: E:\WD Passport\sunset_everett\model\SETUP1_2010-2016_OTHER.SUM

*** 05/14/24
*** 12:00:57
PAGE 2

[illegible]

1.54, 3.09, 5.14, 8.23, 10.80,

*** 05/14/24
*** 12:00:57
PAGE 3

First 24 hours of scalar data																						
YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	WD	HT	REF	TA	HT
10	01	01	1	01	-33.0	0.331	-9.000	-9.000	-999.	456.	120.2	0.56	0.86	1.00	3.10	38.	21.3	284.9	17.7			
10	01	01	1	02	-26.9	0.285	-9.000	-9.000	-999.	367.	89.6	0.56	0.86	1.00	2.70	38.	21.3	284.2	17.7			
10	01	01	1	03	-38.6	0.387	-9.000	-9.000	-999.	577.	164.6	0.56	0.86	1.00	3.60	35.	21.3	284.2	17.7			
10	01	01	1	04	-33.0	0.331	-9.000	-9.000	-999.	458.	120.2	0.56	0.86	1.00	3.10	34.	21.3	283.8	17.7			
10	01	01	1	05	-33.1	0.331	-9.000	-9.000	-999.	456.	120.2	0.56	0.86	1.00	3.10	37.	21.3	283.1	17.7			
10	01	01	1	06	-38.7	0.387	-9.000	-9.000	-999.	577.	164.5	0.56	0.86	1.00	3.60	24.	21.3	283.1	17.7			
10	01	01	1	07	-38.6	0.387	-9.000	-9.000	-999.	577.	164.5	0.56	0.86	1.00	3.60	35.	21.3	283.8	17.7			
10	01	01	1	08	-29.6	0.435	-9.000	-9.000	-999.	688.	251.8	0.56	0.86	0.55	4.00	35.	21.3	283.8	17.7			
10	01	01	1	09	30.0	0.426	0.367	0.008	59.	666.	-232.0	0.56	0.86	0.32	3.60	38.	21.3	286.4	17.7			
10	01	01	1	10	72.3	0.359	0.629	0.008	124.	519.	-57.8	0.56	0.86	0.24	2.70	34.	21.3	290.4	17.7			
10	01	01	1	11	104.4	0.321	0.998	0.008	344.	437.	-28.6	0.56	0.86	0.21	2.20	43.	21.3	292.5	17.7			
10	01	01	1	12	115.1	0.283	1.156	0.008	484.	363.	-17.9	0.56	0.86	0.20	1.80	62.	21.3	295.9	17.7			
10	01	01	1	13	91.4	0.406	1.130	0.008	568.	622.	-66.2	0.56	0.86	0.20	3.10	263.	21.3	294.2	17.7			
10	01	01	1	14	89.3	0.316	1.168	0.008	642.	432.	-31.9	0.56	0.86	0.21	2.20	259.	21.3	294.9	17.7			
10	01	01	1	15	42.6	0.295	0.928	0.008	675.	384.	-54.0	0.56	0.86	0.25	2.20	267.	21.3	294.9	17.7			
10	01	01	1	16	12.0	0.359	0.609	0.008	680.	516.	-347.9	0.56	0.86	0.33	3.10	264.	21.3	292.5	17.7			
10	01	01	1	17	-15.7	0.231	-9.000	-9.000	-999.	276.	70.7	0.56	0.86	0.60	2.20	288.	21.3	290.9	17.7			
10	01	01	1	18	-6.1	0.135	-9.000	-9.000	-999.	124.	36.7	0.56	0.86	1.00	1.30	344.	21.3	289.2	17.7			
10	01	01	1	19	-11.4	0.184	-9.000	-9.000	-999.	190.	49.2	0.56	0.86	1.00	1.80	2.	21.3	288.8	17.7			
10	01	01	1	20	-17.4	0.229	-9.000	-9.000	-999.	263.	62.1	0.56	0.86	1.00	2.20	22.	21.3	288.1	17.7			
10	01	01	1	21	-17.4	0.229	-9.000	-9.000	-999.	263.	61.9	0.56	0.86	1.00	2.20	40.	21.3	287.0	17.7			
10	01																					

First hour of profile data

YR	MO	DY	HR	HEIGHT	F	WDIR	WSPD	AMB	TMP	sigmaA	sigmaW	sigmaV
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10 01 01 01 17.7 0 -999. -99.00 284.9 99.0 -99.00 -99.00
10 01 01 01 21.3 1 38. 3.10 -999.0 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Demolition_Site Preparation_Grading *** 12:00:57
PAGE 4

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS 0.08460 AT (384679.00, 3770421.90, 129.29, 183.69, 0.00)	DC		
	2ND HIGHEST VALUE IS 0.07821 AT (384687.70, 3770525.60, 145.11, 183.69, 0.00)	DC		
	3RD HIGHEST VALUE IS 0.07805 AT (384679.80, 3770430.00, 130.10, 183.69, 0.00)	DC		
	4TH HIGHEST VALUE IS 0.07722 AT (384687.30, 3770518.10, 144.42, 183.69, 0.00)	DC		
	5TH HIGHEST VALUE IS 0.07714 AT (384686.50, 3770510.20, 143.08, 183.69, 0.00)	DC		
	6TH HIGHEST VALUE IS 0.07670 AT (384688.10, 3770533.50, 146.56, 183.69, 0.00)	DC		
	7TH HIGHEST VALUE IS 0.07626 AT (384685.60, 3770502.00, 141.24, 183.69, 0.00)	DC		
	8TH HIGHEST VALUE IS 0.07607 AT (384680.20, 3770437.70, 130.91, 183.69, 0.00)	DC		
	9TH HIGHEST VALUE IS 0.07523 AT (384681.00, 3770446.00, 131.99, 183.69, 0.00)	DC		
	10TH HIGHEST VALUE IS 0.07517 AT (384681.50, 3770453.50, 133.03, 183.69, 0.00)	DC		

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Demolition_Site Preparation_Grading *** 12:00:57
PAGE 5

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 4 Warning Message(s)
A Total of 808 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 4 Calm Hours Identified

A Total of 804 Missing Hours Identified (1.83 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 1698 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 1698 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
MX W450 17521 CHKDAT: Record Out of Sequence in Meteorological File at: 14010101
MX W450 17521 CHKDAT: Record Out of Sequence in Meteorological File at: 2 year gap

**BEE-Line Software: (Version 12.10) data input file
** Model: AERMOD.EXE Input File Creation Date: 5/14/2024 Time: 12:25:13 PM
NO ECHO

CO STARTING
CO TITLEONE Sunset and Everett
CO TITLETWO Diesel Particulates / Trenching_Building Construction_Architectural Coating
CO MODELOPT DFAULT CONC NODRYDPLT NOWETDPLT
CO AVERTIME ANNUAL
CO URBANOPT 9818605 LOS_ANGELES 1.0
CO POLLUTID OTHER
CO RUNORNOT RUN
CO FINISHED

SO STARTING
SO ELEVUNIT METERS
SO LOCATION C_1 VOLUME 384670. 3770380. 124.87
SO SRCPARAM C_1 2.5913E-05 5. 2.32 1.4
SO LOCATION C_2 VOLUME 384675. 3770380. 124.98
SO SRCPARAM C_2 2.5913E-05 5. 2.32 1.4
SO LOCATION C_3 VOLUME 384669.2 3770385. 124.96
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SO LOCATION C_4 VOLUME 384673.9 3770384.6 125.05
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SO LOCATION C_5 VOLUME 384678.3 3770384.6 125.12
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SO LOCATION C_6 VOLUME 384665.3 3770389.7 124.95
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SO LOCATION C_128 VOLUME 384650. 3770510. 129.18
SO SRCPARAM C_128 2.5913E-05 5. 2.32 1.4
SO LOCATION C_129 VOLUME 384655. 3770510. 131.79
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SO LOCATION C_130 VOLUME 384660. 3770510. 134.91
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SO EMISFACT C_2 HROFDY 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 0 0 0 0 0 0 0 0
SO EMISFACT C_3 HROFDY 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 0 0 0 0 0 0 0 0
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SO EMISFACT C_6 HROFDY 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 0 0 0 0 0 0 0 0
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SO EMISFACT C_13 HROFDY 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 0 0 0 0 0 0 0 0

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SO	EMISFACT	C_91	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_92	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_93	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_94	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_95	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_96	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_97	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_98	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_99	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_100	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_101	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
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SO	EMISFACT	C_103	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_104	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_105	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_106	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_107	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_108	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_109	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_110	HROFDY	0	0	0	0	0	0	0	0	0	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
SO	EMISFACT	C_111	HROFDY																									

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SO EMISFACT C_247 HROFDY 0 0 0 0 0 0 0 0 1 1 1 1 1 1 1 0 0 0 0 0 0 0 0
SO SRCGROUP ALL
SO FINISHED

RE STARTING

RE ELEVUNIT METERS

RE DISCCART 384592.00 3770334.00 135.01 181.44
RE DISCCART 384600.00 3770334.00 134.32 181.77
RE DISCCART 384608.00 3770334.00 132.68 183.69
RE DISCCART 384616.00 3770334.00 129.39 183.69
RE DISCCART 384624.00 3770334.00 127.71 183.69
RE DISCCART 384632.00 3770334.00 125.68 183.69
RE DISCCART 384640.00 3770334.00 124.35 183.69
RE DISCCART 384712.00 3770334.00 126.69 183.69
RE DISCCART 384592.00 3770342.00 134.89 181.70
RE DISCCART 384600.00 3770342.00 134.06 182.82
RE DISCCART 384608.00 3770342.00 132.44 183.69
RE DISCCART 384616.00 3770342.00 129.05 183.69
RE DISCCART 384624.00 3770342.00 126.60 183.69
RE DISCCART 384632.00 3770342.00 124.06 183.69
RE DISCCART 384640.00 3770342.00 123.78 183.69
RE DISCCART 384704.00 3770342.00 126.43 183.69
RE DISCCART 384712.00 3770342.00 126.98 183.69
RE DISCCART 384720.00 3770342.00 127.23 183.69
RE DISCCART 384728.00 3770342.00 127.61 183.69
RE DISCCART 384736.00 3770342.00 128.28 183.69
RE DISCCART 384744.00 3770342.00 129.07 183.69
RE DISCCART 384752.00 3770342.00 129.85 183.69
RE DISCCART 384592.00 3770350.00 134.61 182.03
RE DISCCART 384600.00 3770350.00 133.47 183.69
RE DISCCART 384608.00 3770350.00 131.91 183.69
RE DISCCART 384616.00 3770350.00 129.04 183.69
RE DISCCART 384624.00 3770350.00 126.07 183.69
RE DISCCART 384632.00 3770350.00 124.12 183.69
RE DISCCART 384639.21 3770350.19 123.97 183.69
RE DISCCART 384696.00 3770350.00 125.03 183.69
RE DISCCART 384704.00 3770350.00 126.48 183.69
RE DISCCART 384712.00 3770350.00 127.44 183.69
RE DISCCART 384720.00 3770350.00 127.71 183.69
RE DISCCART 384728.00 3770350.00 127.96 183.69
RE DISCCART 384736.00 3770350.00 128.37 183.69
RE DISCCART 384744.00 3770350.00 129.16 183.69
RE DISCCART 384752.00 3770350.00 130.39 183.69
RE DISCCART 384584.00 3770358.00 134.24 182.82
RE DISCCART 384592.00 3770358.00 133.61 183.69
RE DISCCART 384600.00 3770358.00 132.46 183.69
RE DISCCART 384608.00 3770358.00 131.20 183.69
RE DISCCART 384616.00 3770358.00 129.13 183.69
RE DISCCART 384624.00 3770358.00 126.80 183.69
RE DISCCART 384632.00 3770358.00 124.41 183.69
RE DISCCART 384637.96 3770358.10 124.21 183.69
RE DISCCART 384696.00 3770358.00 125.81 183.69
RE DISCCART 384704.00 3770358.00 127.22 183.69
RE DISCCART 384712.00 3770358.00 127.82 183.69
RE DISCCART 384720.00 3770358.00 128.02 183.69
RE DISCCART 384728.00 3770358.00 128.21 183.69
RE DISCCART 384736.00 3770358.00 128.47 183.69
RE DISCCART 384744.00 3770358.00 128.97 183.69
RE DISCCART 384752.00 3770358.00 131.01 183.69
RE DISCCART 384760.00 3770358.00 131.17 183.69
RE DISCCART 384584.00 3770366.00 133.46 183.69
RE DISCCART 384592.00 3770366.00 132.85 183.69
RE DISCCART 384600.00 3770366.00 131.61 183.69
RE DISCCART 384608.00 3770366.00 130.61 183.69
RE DISCCART 384616.00 3770366.00 128.97 183.69
RE DISCCART 384624.00 3770366.00 127.30 183.69
RE DISCCART 384632.00 3770366.00 124.74 183.69

RE DISCCART	384697.54	3770365.60	126.43	183.69
RE DISCCART	384704.00	3770366.00	127.33	183.69
RE DISCCART	384712.00	3770366.00	128.06	183.69
RE DISCCART	384720.00	3770366.00	128.26	183.69
RE DISCCART	384728.00	3770366.00	128.49	183.69
RE DISCCART	384736.00	3770366.00	128.68	183.69
RE DISCCART	384744.00	3770366.00	129.14	183.69
RE DISCCART	384752.00	3770366.00	131.27	183.69
RE DISCCART	384760.00	3770366.00	131.49	183.69
RE DISCCART	384584.00	3770374.00	132.94	183.69
RE DISCCART	384592.00	3770374.00	132.31	183.69
RE DISCCART	384600.00	3770374.00	130.97	183.69
RE DISCCART	384608.00	3770374.00	130.06	183.69
RE DISCCART	384616.00	3770374.00	128.54	183.69
RE DISCCART	384624.00	3770374.00	127.32	183.69
RE DISCCART	384632.00	3770374.00	125.04	183.69
RE DISCCART	384704.00	3770374.00	127.49	183.69
RE DISCCART	384712.00	3770374.00	128.35	183.69
RE DISCCART	384720.00	3770374.00	128.63	183.69
RE DISCCART	384728.00	3770374.00	129.06	183.69
RE DISCCART	384736.00	3770374.00	129.50	183.69
RE DISCCART	384744.00	3770374.00	129.83	183.69
RE DISCCART	384752.00	3770374.00	131.13	183.69
RE DISCCART	384760.00	3770374.00	131.85	183.69
RE DISCCART	384768.00	3770374.00	132.19	183.69
RE DISCCART	384584.00	3770382.00	132.37	183.69
RE DISCCART	384592.00	3770382.00	131.68	183.69
RE DISCCART	384600.00	3770382.00	130.44	183.69
RE DISCCART	384608.00	3770382.00	129.39	183.69
RE DISCCART	384616.00	3770382.00	127.93	183.69
RE DISCCART	384624.00	3770382.00	126.84	183.69
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RE DISCCART	384704.63	3770381.44	128.04	183.69
RE DISCCART	384712.00	3770382.00	128.81	183.69
RE DISCCART	384720.00	3770382.00	129.29	183.69
RE DISCCART	384728.00	3770382.00	129.93	183.69
RE DISCCART	384736.00	3770382.00	130.68	183.69
RE DISCCART	384744.00	3770382.00	130.95	183.69
RE DISCCART	384752.00	3770382.00	131.14	183.69
RE DISCCART	384760.00	3770382.00	132.26	183.69
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RE DISCCART	384584.00	3770390.00	131.75	183.69
RE DISCCART	384592.00	3770390.00	130.96	183.69
RE DISCCART	384600.00	3770390.00	130.08	183.69
RE DISCCART	384608.00	3770390.00	128.96	183.69
RE DISCCART	384616.00	3770390.00	127.53	183.69
RE DISCCART	384624.00	3770390.00	126.29	183.69
RE DISCCART	384712.00	3770390.00	129.47	183.69
RE DISCCART	384720.00	3770390.00	130.53	183.69
RE DISCCART	384728.00	3770390.00	130.98	183.69
RE DISCCART	384736.00	3770390.00	131.26	183.69
RE DISCCART	384744.00	3770390.00	132.15	183.69
RE DISCCART	384752.00	3770390.00	132.40	183.69
RE DISCCART	384760.00	3770390.00	132.86	183.69
RE DISCCART	384768.00	3770390.00	133.06	183.69
RE DISCCART	384776.00	3770390.00	133.36	183.69
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RE DISCCART	384584.00	3770398.00	131.00	183.69
RE DISCCART	384592.00	3770398.00	130.29	183.69
RE DISCCART	384600.00	3770398.00	129.67	183.69
RE DISCCART	384608.00	3770398.00	128.45	183.69
RE DISCCART	384616.00	3770398.00	127.20	183.69
RE DISCCART	384624.00	3770398.00	126.15	183.69
RE DISCCART	384712.00	3770398.00	129.95	183.69
RE DISCCART	384720.00	3770398.00	130.95	183.69
RE DISCCART	384728.00	3770398.00	131.78	183.69
RE DISCCART	384736.00	3770398.00	132.29	183.69
RE DISCCART	384744.00	3770398.00	132.73	183.69
RE DISCCART	384752.00	3770398.00	133.29	183.69
RE DISCCART	384760.04	3770396.44	133.82	183.69
RE DISCCART	384574.63	3770404.77	131.43	183.69
RE DISCCART	384584.00	3770406.00	130.50	183.69
RE DISCCART	384592.00	3770406.00	129.76	183.69
RE DISCCART	384600.00	3770406.00	129.10	183.69
RE DISCCART	384608.00	3770406.00	127.93	183.69

RE DISCCART	384616.00	3770406.00	126.86	183.69
RE DISCCART	384624.00	3770406.00	125.99	183.69
RE DISCCART	384714.21	3770405.60	130.78	183.69
RE DISCCART	384720.00	3770406.00	131.42	183.69
RE DISCCART	384728.00	3770406.00	132.44	183.69
RE DISCCART	384736.00	3770406.00	133.21	183.69
RE DISCCART	384744.21	3770403.52	133.48	183.69
RE DISCCART	384615.88	3770412.27	126.58	183.69
RE DISCCART	384622.54	3770413.52	125.93	183.69
RE DISCCART	384720.00	3770414.00	132.01	183.69
RE DISCCART	384679.00	3770421.90	129.29	183.69
RE DISCCART	384686.70	3770422.00	130.73	183.69
RE DISCCART	384696.00	3770422.00	131.54	183.69
RE DISCCART	384576.00	3770430.00	131.88	183.69
RE DISCCART	384584.21	3770430.19	130.23	183.69
RE DISCCART	384591.71	3770430.60	129.20	183.69
RE DISCCART	384599.63	3770431.85	128.74	183.69
RE DISCCART	384679.80	3770430.00	130.10	183.69
RE DISCCART	384687.54	3770429.77	131.84	183.69
RE DISCCART	384698.38	3770429.77	132.45	183.69
RE DISCCART	384569.20	3770438.00	134.24	183.69
RE DISCCART	384576.00	3770438.00	132.42	183.69
RE DISCCART	384584.00	3770438.00	130.24	183.69
RE DISCCART	384592.00	3770438.00	129.16	183.69
RE DISCCART	384600.00	3770438.00	128.95	183.69
RE DISCCART	384608.00	3770438.00	128.42	183.69
RE DISCCART	384616.00	3770438.00	126.67	183.69
RE DISCCART	384680.20	3770437.70	130.91	183.69
RE DISCCART	384688.38	3770436.85	132.56	183.69
RE DISCCART	384698.79	3770437.27	133.04	183.69
RE DISCCART	384568.00	3770446.00	135.34	183.69
RE DISCCART	384576.00	3770446.00	133.19	183.69
RE DISCCART	384584.00	3770446.00	130.43	183.69
RE DISCCART	384592.00	3770446.00	129.18	183.69
RE DISCCART	384600.00	3770446.00	129.19	183.69
RE DISCCART	384608.00	3770446.00	128.93	183.69
RE DISCCART	384616.00	3770446.00	126.76	183.69
RE DISCCART	384681.00	3770446.00	131.99	183.69
RE DISCCART	384689.21	3770445.19	133.39	183.69
RE DISCCART	384698.79	3770445.19	133.78	183.69
RE DISCCART	384568.00	3770454.00	136.78	183.69
RE DISCCART	384576.00	3770454.00	134.69	183.69
RE DISCCART	384584.00	3770454.00	131.00	183.69
RE DISCCART	384592.00	3770454.00	129.25	183.69
RE DISCCART	384600.00	3770454.00	129.27	183.69
RE DISCCART	384608.00	3770454.00	128.96	183.69
RE DISCCART	384615.04	3770453.94	127.15	183.69
RE DISCCART	384681.50	3770453.50	133.03	183.69
RE DISCCART	384690.46	3770453.52	134.72	183.69
RE DISCCART	384699.63	3770453.52	134.94	183.69
RE DISCCART	384709.21	3770453.10	135.24	183.69
RE DISCCART	384568.00	3770462.00	137.09	183.69
RE DISCCART	384576.00	3770462.00	134.32	183.69
RE DISCCART	384584.00	3770462.00	130.28	183.69
RE DISCCART	384592.00	3770462.00	129.36	183.69
RE DISCCART	384600.00	3770462.00	129.21	183.69
RE DISCCART	384608.00	3770462.00	128.96	183.69
RE DISCCART	384614.63	3770461.44	127.34	183.69
RE DISCCART	384682.30	3770461.40	135.13	183.69
RE DISCCART	384690.88	3770461.44	136.19	183.69
RE DISCCART	384700.46	3770461.02	136.21	183.69
RE DISCCART	384709.63	3770460.19	136.13	183.69
RE DISCCART	384568.00	3770470.00	135.72	183.69
RE DISCCART	384576.00	3770470.00	133.86	183.69
RE DISCCART	384584.00	3770470.00	131.04	183.69
RE DISCCART	384592.00	3770470.00	129.60	183.69
RE DISCCART	384600.00	3770470.00	129.23	183.69
RE DISCCART	384608.00	3770470.00	128.77	183.69
RE DISCCART	384682.70	3770469.80	136.38	183.69
RE DISCCART	384691.29	3770469.77	137.50	183.69
RE DISCCART	384700.46	3770469.35	137.75	183.69
RE DISCCART	384710.04	3770468.94	137.52	183.69
RE DISCCART	384717.10	3770469.40	137.53	183.69
RE DISCCART	384562.10	3770478.00	136.72	183.69
RE DISCCART	384568.00	3770478.00	134.19	183.69

RE DISCCART	384576.00	3770478.00	132.68	183.69
RE DISCCART	384584.00	3770478.00	131.47	183.69
RE DISCCART	384592.00	3770478.00	130.06	183.69
RE DISCCART	384600.00	3770478.00	129.34	183.69
RE DISCCART	384608.00	3770478.00	128.35	183.69
RE DISCCART	384683.50	3770477.70	137.53	183.69
RE DISCCART	384691.70	3770477.70	138.34	183.69
RE DISCCART	384701.29	3770477.69	138.40	183.69
RE DISCCART	384710.88	3770477.27	138.30	183.69
RE DISCCART	384720.00	3770478.00	138.47	183.69
RE DISCCART	384560.88	3770486.02	137.24	183.69
RE DISCCART	384568.00	3770486.00	133.57	183.69
RE DISCCART	384576.00	3770486.00	131.06	183.69
RE DISCCART	384584.00	3770486.00	130.91	183.69
RE DISCCART	384592.00	3770486.00	130.63	183.69
RE DISCCART	384600.00	3770486.00	129.50	183.69
RE DISCCART	384608.00	3770486.00	127.89	183.69
RE DISCCART	384684.00	3770486.00	138.85	183.69
RE DISCCART	384693.00	3770486.00	139.26	183.69
RE DISCCART	384702.10	3770485.60	138.81	183.69
RE DISCCART	384710.88	3770485.60	139.03	183.69
RE DISCCART	384720.00	3770486.00	139.59	183.69
RE DISCCART	384560.00	3770494.00	137.37	183.69
RE DISCCART	384568.00	3770494.00	133.97	183.69
RE DISCCART	384576.00	3770494.00	131.43	183.69
RE DISCCART	384584.00	3770494.00	131.06	183.69
RE DISCCART	384592.00	3770494.00	130.82	183.69
RE DISCCART	384600.00	3770494.00	129.64	183.69
RE DISCCART	384608.00	3770494.00	128.02	183.69
RE DISCCART	384684.80	3770493.90	140.45	183.69
RE DISCCART	384693.40	3770493.50	140.78	183.69
RE DISCCART	384702.54	3770493.52	140.44	183.69
RE DISCCART	384712.00	3770494.00	140.95	183.69
RE DISCCART	384720.00	3770494.00	141.26	183.69
RE DISCCART	384728.00	3770494.00	141.21	183.69
RE DISCCART	384560.00	3770502.00	139.73	183.38
RE DISCCART	384568.00	3770502.00	136.79	183.69
RE DISCCART	384576.00	3770502.00	133.77	183.69
RE DISCCART	384584.00	3770502.00	132.92	183.69
RE DISCCART	384592.00	3770502.00	130.70	183.69
RE DISCCART	384600.00	3770502.00	129.09	183.69
RE DISCCART	384607.50	3770502.00	128.22	183.69
RE DISCCART	384685.60	3770502.00	141.24	183.69
RE DISCCART	384693.80	3770502.00	141.76	183.69
RE DISCCART	384703.00	3770502.00	141.90	183.69
RE DISCCART	384712.00	3770502.00	142.38	183.69
RE DISCCART	384720.00	3770502.00	142.79	183.69
RE DISCCART	384728.00	3770502.00	142.84	183.69
RE DISCCART	384560.00	3770510.00	141.49	182.82
RE DISCCART	384568.00	3770510.00	138.92	183.69
RE DISCCART	384576.00	3770510.00	135.68	183.69
RE DISCCART	384584.00	3770510.00	133.93	183.69
RE DISCCART	384592.00	3770510.00	131.67	183.69
RE DISCCART	384600.00	3770510.00	129.42	183.69
RE DISCCART	384605.90	3770510.00	128.61	183.69
RE DISCCART	384686.50	3770510.20	143.08	183.69
RE DISCCART	384694.20	3770509.80	143.41	183.69
RE DISCCART	384703.38	3770509.77	143.56	183.69
RE DISCCART	384712.00	3770510.00	144.04	183.69
RE DISCCART	384720.00	3770510.00	144.27	183.69
RE DISCCART	384728.00	3770510.00	144.16	183.69
RE DISCCART	384554.21	3770518.10	142.98	181.70
RE DISCCART	384560.00	3770518.00	141.92	182.82
RE DISCCART	384568.00	3770518.00	139.32	183.69
RE DISCCART	384576.00	3770518.00	136.18	183.69
RE DISCCART	384584.00	3770518.00	133.74	183.69
RE DISCCART	384592.00	3770518.00	132.63	183.69
RE DISCCART	384600.00	3770518.00	129.91	183.69
RE DISCCART	384695.00	3770518.00	144.87	183.69
RE DISCCART	384704.00	3770518.00	144.97	183.69
RE DISCCART	384712.00	3770518.00	145.19	183.69
RE DISCCART	384720.00	3770518.00	145.25	183.69
RE DISCCART	384728.00	3770518.00	145.22	183.69
RE DISCCART	384552.50	3770526.00	144.08	145.66
RE DISCCART	384560.00	3770526.00	141.09	183.38

RE DISCCART	384568.00	3770526.00	137.48	183.69
RE DISCCART	384576.00	3770526.00	134.51	183.69
RE DISCCART	384584.00	3770526.00	132.64	183.69
RE DISCCART	384592.00	3770526.00	132.07	183.69
RE DISCCART	384600.00	3770526.00	129.62	183.69
RE DISCCART	384687.70	3770525.60	145.11	183.69
RE DISCCART	384695.04	3770526.02	145.94	183.69
RE DISCCART	384704.00	3770526.00	146.08	183.69
RE DISCCART	384712.00	3770526.00	146.06	183.69
RE DISCCART	384720.00	3770526.00	146.03	183.69
RE DISCCART	384728.00	3770526.00	146.19	183.69
RE DISCCART	384736.00	3770526.00	144.50	183.69
RE DISCCART	384552.00	3770534.00	144.45	145.66
RE DISCCART	384560.00	3770534.00	141.25	183.38
RE DISCCART	384568.00	3770534.00	137.08	183.69
RE DISCCART	384576.00	3770534.00	133.02	183.69
RE DISCCART	384584.00	3770534.00	132.17	183.69
RE DISCCART	384592.00	3770534.00	131.19	183.69
RE DISCCART	384600.00	3770534.00	129.29	183.69
RE DISCCART	384688.10	3770533.50	146.56	183.69
RE DISCCART	384695.46	3770533.52	147.72	183.69
RE DISCCART	384704.00	3770534.00	148.10	183.69
RE DISCCART	384712.00	3770534.00	147.89	183.69
RE DISCCART	384720.00	3770534.00	147.56	183.69
RE DISCCART	384728.00	3770534.00	147.38	183.69
RE DISCCART	384736.00	3770534.00	146.12	183.69
RE DISCCART	384552.00	3770542.00	144.31	181.44
RE DISCCART	384560.00	3770542.00	140.98	183.38
RE DISCCART	384568.00	3770542.00	136.90	183.69
RE DISCCART	384576.00	3770542.00	133.16	183.69
RE DISCCART	384584.00	3770542.00	132.51	183.69
RE DISCCART	384592.00	3770542.00	131.25	183.69
RE DISCCART	384600.00	3770542.00	129.30	183.69
RE DISCCART	384689.00	3770542.00	147.82	183.69
RE DISCCART	384696.00	3770542.00	148.38	183.69
RE DISCCART	384704.00	3770542.00	148.64	183.69
RE DISCCART	384712.00	3770542.00	149.01	183.69
RE DISCCART	384720.00	3770542.00	148.87	183.69
RE DISCCART	384728.00	3770542.00	148.48	183.69
RE DISCCART	384736.00	3770542.00	148.17	183.69
RE DISCCART	384552.00	3770550.00	144.28	181.70
RE DISCCART	384560.00	3770550.00	140.94	183.38
RE DISCCART	384568.00	3770550.00	137.34	183.69
RE DISCCART	384576.00	3770550.00	134.27	183.69
RE DISCCART	384584.00	3770550.00	133.40	183.69
RE DISCCART	384592.00	3770550.00	131.76	183.69
RE DISCCART	384599.20	3770550.00	129.69	183.69
RE DISCCART	384689.40	3770549.80	148.57	183.69
RE DISCCART	384696.00	3770550.00	149.27	183.69
RE DISCCART	384704.00	3770550.00	149.46	183.69
RE DISCCART	384712.00	3770550.00	149.77	183.69
RE DISCCART	384720.00	3770550.00	149.70	183.69
RE DISCCART	384728.00	3770550.00	149.47	183.69
RE DISCCART	384736.00	3770550.00	149.38	183.69
RE DISCCART	384742.13	3770549.77	148.68	183.69
RE DISCCART	384552.00	3770558.00	144.54	181.70
RE DISCCART	384560.00	3770558.00	141.44	183.38
RE DISCCART	384568.00	3770558.00	138.46	183.69
RE DISCCART	384576.00	3770558.00	135.80	183.69
RE DISCCART	384584.00	3770558.00	134.48	183.69
RE DISCCART	384592.00	3770558.00	132.31	183.69
RE DISCCART	384598.79	3770557.27	130.05	183.69
RE DISCCART	384690.00	3770558.00	149.24	183.69
RE DISCCART	384696.00	3770558.00	150.25	183.69
RE DISCCART	384704.00	3770558.00	150.39	183.69
RE DISCCART	384712.00	3770558.00	150.50	183.69
RE DISCCART	384720.00	3770558.00	150.55	183.69
RE DISCCART	384728.00	3770558.00	150.63	183.69
RE DISCCART	384736.00	3770558.00	150.40	183.69
RE DISCCART	384744.00	3770558.00	149.61	183.69
RE DISCCART	384552.00	3770566.00	144.77	181.70
RE DISCCART	384560.00	3770566.00	141.86	183.38
RE DISCCART	384568.00	3770566.00	139.48	183.69
RE DISCCART	384576.00	3770566.00	137.07	183.69
RE DISCCART	384584.00	3770566.00	134.97	183.69

RE DISCCART	384592.00	3770566.00	132.45	183.69
RE DISCCART	384598.50	3770566.00	130.36	183.69
RE DISCCART	384690.20	3770566.00	149.71	183.69
RE DISCCART	384696.30	3770566.00	150.95	183.69
RE DISCCART	384704.00	3770566.00	151.19	183.69
RE DISCCART	384712.00	3770566.00	151.55	183.69
RE DISCCART	384720.00	3770566.00	151.80	183.69
RE DISCCART	384728.00	3770566.00	152.08	183.69
RE DISCCART	384736.00	3770566.00	151.71	183.69
RE DISCCART	384744.00	3770566.00	150.85	183.69
RE DISCCART	384552.00	3770574.00	144.84	181.70
RE DISCCART	384560.00	3770574.00	142.02	183.38
RE DISCCART	384568.00	3770574.00	139.84	183.69
RE DISCCART	384576.00	3770574.00	137.44	183.69
RE DISCCART	384584.00	3770574.00	135.22	183.69
RE DISCCART	384592.00	3770574.00	132.93	183.69
RE DISCCART	384598.40	3770574.00	130.69	183.69
RE DISCCART	384691.00	3770574.00	150.71	183.69
RE DISCCART	384696.70	3770574.00	152.45	183.69
RE DISCCART	384704.00	3770574.00	152.77	183.69
RE DISCCART	384712.00	3770574.00	153.42	183.69
RE DISCCART	384720.00	3770574.00	153.53	183.69
RE DISCCART	384728.00	3770574.00	153.38	183.69
RE DISCCART	384736.00	3770574.00	153.34	183.69
RE DISCCART	384744.00	3770574.00	152.18	183.69
RE DISCCART	384552.00	3770582.00	145.21	181.70
RE DISCCART	384560.00	3770582.00	142.28	183.38
RE DISCCART	384568.00	3770582.00	140.09	183.69
RE DISCCART	384576.00	3770582.00	137.71	183.69
RE DISCCART	384584.00	3770582.00	135.45	183.69
RE DISCCART	384592.00	3770582.00	133.31	183.69
RE DISCCART	384598.40	3770582.00	130.95	183.69
RE DISCCART	384691.50	3770582.00	151.37	183.69
RE DISCCART	384697.00	3770582.00	153.22	183.69
RE DISCCART	384704.00	3770582.00	153.93	183.69
RE DISCCART	384712.00	3770582.00	154.34	183.69
RE DISCCART	384720.00	3770582.00	154.68	183.69
RE DISCCART	384728.00	3770582.00	154.47	183.69
RE DISCCART	384736.00	3770582.00	154.28	183.69
RE DISCCART	384744.00	3770582.00	153.31	183.69
RE DISCCART	384552.00	3770590.00	145.74	181.70
RE DISCCART	384560.00	3770590.00	142.63	183.38
RE DISCCART	384568.00	3770590.00	140.31	183.69
RE DISCCART	384576.00	3770590.00	138.07	183.69
RE DISCCART	384584.00	3770590.00	135.76	183.69
RE DISCCART	384592.00	3770590.00	133.61	183.69
RE DISCCART	384598.40	3770590.00	131.18	183.69
RE DISCCART	384691.90	3770590.20	152.12	183.69
RE DISCCART	384697.00	3770590.00	153.88	183.69
RE DISCCART	384704.00	3770590.00	154.93	183.69
RE DISCCART	384712.00	3770590.00	155.08	183.69
RE DISCCART	384720.00	3770590.00	155.32	183.69
RE DISCCART	384728.00	3770590.00	155.17	183.69
RE DISCCART	384736.00	3770590.00	154.96	183.69
RE DISCCART	384744.00	3770590.00	154.41	183.69
RE DISCCART	384552.00	3770598.00	146.03	181.70
RE DISCCART	384560.00	3770598.00	142.94	183.38
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RE DISCCART	384704.00	3770598.00	155.77	183.50
RE DISCCART	384712.00	3770598.00	155.97	183.69
RE DISCCART	384720.00	3770598.00	155.97	183.69
RE DISCCART	384728.00	3770598.00	155.97	183.69
RE DISCCART	384736.00	3770598.00	155.89	183.69
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RE DISCCART	384584.00	3770606.00	134.76	183.69

RE DISCCART	384592.00	3770606.00	133.12	183.69
RE DISCCART	384598.40	3770606.00	131.35	183.69
RE DISCCART	384640.50	3770606.00	136.11	183.69
RE DISCCART	384648.00	3770606.00	138.52	183.69
RE DISCCART	384656.00	3770606.00	141.40	183.69
RE DISCCART	384664.00	3770606.00	144.34	183.69
RE DISCCART	384672.00	3770606.00	146.91	183.69
RE DISCCART	384680.00	3770606.00	149.37	183.69
RE DISCCART	384688.00	3770606.00	152.25	183.69
RE DISCCART	384696.00	3770606.00	155.08	183.69
RE DISCCART	384704.00	3770606.00	156.32	183.38
RE DISCCART	384712.00	3770606.00	157.10	183.38
RE DISCCART	384720.00	3770606.00	157.56	183.50
RE DISCCART	384728.00	3770606.00	157.80	183.69
RE DISCCART	384736.00	3770606.00	157.77	183.69
RE DISCCART	384744.00	3770606.00	156.98	183.69
RE DISCCART	384552.00	3770614.00	146.34	181.70
RE DISCCART	384560.00	3770614.00	141.77	183.69
RE DISCCART	384568.00	3770614.00	138.05	183.69
RE DISCCART	384576.00	3770614.00	135.07	183.69
RE DISCCART	384584.00	3770614.00	134.50	183.69
RE DISCCART	384592.00	3770614.00	132.79	183.69
RE DISCCART	384598.40	3770614.00	131.43	183.69
RE DISCCART	384640.50	3770614.00	136.09	183.69
RE DISCCART	384648.00	3770614.00	138.45	183.69
RE DISCCART	384656.00	3770614.00	141.31	183.69
RE DISCCART	384664.00	3770614.00	144.34	183.69
RE DISCCART	384672.00	3770614.00	146.99	183.69
RE DISCCART	384680.00	3770614.00	149.49	183.69
RE DISCCART	384688.00	3770614.00	152.62	183.69
RE DISCCART	384696.00	3770614.00	155.70	183.50
RE DISCCART	384704.00	3770614.00	156.27	183.50
RE DISCCART	384712.00	3770614.00	156.79	183.69
RE DISCCART	384720.00	3770614.00	157.59	183.69
RE DISCCART	384728.00	3770614.00	157.91	183.69
RE DISCCART	384736.00	3770614.00	158.35	183.69
RE DISCCART	384744.00	3770614.00	158.08	183.69
RE DISCCART	384552.00	3770622.00	146.79	181.70
RE DISCCART	384560.00	3770622.00	142.82	183.38
RE DISCCART	384568.00	3770622.00	139.33	183.69
RE DISCCART	384576.00	3770622.00	135.50	183.69
RE DISCCART	384584.00	3770622.00	134.43	183.69
RE DISCCART	384592.00	3770622.00	132.71	183.69
RE DISCCART	384598.38	3770621.85	131.52	183.69
RE DISCCART	384640.50	3770622.00	135.53	183.69
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RE DISCCART	384664.00	3770622.00	144.42	183.69
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RE DISCCART	384680.00	3770622.00	149.91	183.69
RE DISCCART	384688.00	3770622.00	152.91	183.69
RE DISCCART	384696.00	3770622.00	155.85	183.50
RE DISCCART	384704.00	3770622.00	156.56	183.50
RE DISCCART	384712.00	3770622.00	157.26	183.50
RE DISCCART	384720.00	3770622.00	158.56	183.38
RE DISCCART	384728.00	3770622.00	158.47	183.69
RE DISCCART	384736.00	3770622.00	158.96	183.69
RE DISCCART	384744.00	3770622.00	159.16	183.69
RE DISCCART	384640.50	3770630.00	134.50	183.69
RE DISCCART	384648.00	3770630.00	137.77	183.69
RE DISCCART	384656.00	3770630.00	140.92	183.69
RE DISCCART	384664.00	3770630.00	144.12	183.69
RE DISCCART	384672.00	3770630.00	147.28	183.69
RE DISCCART	384680.00	3770630.00	150.24	183.69
RE DISCCART	384688.00	3770630.00	153.19	183.69
RE DISCCART	384696.00	3770630.00	155.97	183.50
RE DISCCART	384704.00	3770630.00	157.22	183.38
RE DISCCART	384712.00	3770630.00	158.34	183.38
RE DISCCART	384720.00	3770630.00	159.61	183.38
RE DISCCART	384728.00	3770630.00	159.61	183.38
RE DISCCART	384736.00	3770630.00	160.04	183.50
RE DISCCART	384744.00	3770630.00	160.34	183.69
RE DISCCART	384703.79	3770636.02	157.92	183.38
RE DISCCART	384712.13	3770636.44	159.46	183.38
RE DISCCART	384719.63	3770636.44	160.03	183.38

RE DISCCART 384727.96 3770637.27 161.06 183.38
RE DISCCART 384736.00 3770638.00 161.66 183.38
RE DISCCART 384744.00 3770638.00 161.67 183.38
RE DISCCART 384687.30 3770518.10 144.42 183.69
RE DISCCART 384707.54 3770444.77 134.17 183.69
RE FINISHED

ME STARTING
ME SURFFILE "E:\WD Passport\sunset_everett\metdata\CELA_v9.SFC" FREE
ME PROFFILE "E:\WD Passport\sunset_everett\metdata\CELA_v9.PFL" FREE
ME SURFDATA 99999 2010
ME UAIRDATA 3190 2010
ME SITEDATA 99999 2010-2016
ME PROFBASE 87 METERS
ME FINISHED

OU STARTING
OU PLOTFILE ANNUAL ALL "E:\WD Passport\sunset_everett\model\SETUP2_2010-2016_OTHER.GRF" 31
OU SUMMFILE "E:\WD Passport\sunset_everett\model\SETUP2_2010-2016_OTHER.SUM"
OU FINISHED

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Trenching_Building Construction_Architectural *** 12:25:16
PAGE 1

*** MODELOPTs: RegDEFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** MODEL SETUP OPTIONS SUMMARY ***

** Model Options Selected:

- * Model Uses Regulatory DEFAULT Options
- * Model Is Setup For Calculation of Average CONCentration Values.
- * NO GAS DEPOSITION Data Provided.
- * NO PARTICLE DEPOSITION Data Provided.
- * Model Uses NO DRY DEPLETION. DDPLETE = F
- * Model Uses NO WET DEPLETION. WETDPLT = F
- * Stack-tip Downwash.
- * Model Accounts for ELEVated Terrain Effects.
- * Use Calms Processing Routine.
- * Use Missing Data Processing Routine.
- * No Exponential Decay.
- * Model Uses URBAN Dispersion Algorithm for the SBL for 247 Source(s),
for Total of 1 Urban Area(s):
Urban Population = 9818605.0 ; Urban Roughness Length = 1.000 m
- * Urban Roughness Length of 1.0 Meter Used.
- * ADJ_U* - Use ADJ_U* option for SBL in AERMET
- * TEMP_Sub - Meteorological data includes TEMP substitutions
- * Model Assumes No FLAGPOLE Receptor Heights.
- * The User Specified a Pollutant Type of: OTHER

**Model Calculates ANNUAL Averages Only

**This Run Includes: 247 Source(s); 1 Source Group(s); and 516 Receptor(s)

with: 0 POINT(s), including
 0 POINTCAP(s) and 0 POINTHOR(s)
and: 247 VOLUME source(s)
and: 0 AREA type source(s)
and: 0 LINE source(s)
and: 0 RLINE/RLINEXT source(s)
and: 0 OPENPIT source(s)
and: 0 BUOYANT LINE source(s) with a total of 0 line(s)
and: 0 SWPOINT source(s)

**Model Set To Continue RUNning After the Setup Testing.

**The AERMET Input Meteorological Data Version Date: 16216

**Output Options Selected:

Model Outputs Tables of ANNUAL Averages by Receptor
Model Outputs External File(s) of High Values for Plotting (PLOTFILE Keyword)
Model Outputs Separate Summary File of High Ranked Values (SUMMFILE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
 m for Missing Hours
 b for Both Calm and Missing Hours

**Misc. Inputs: Base Elev. for Pot. Temp. Profile (m MSL) = 87.00 ; Decay Coef. = 0.000 ; Rot. Angle = 0.0
Emission Units = GRAMS/SEC ; Emission Rate Unit Factor = 0.10000E+07
Output Units = MICROGRAMS/M**3

**Approximate Storage Requirements of Model = 3.7 MB of RAM.

**Input Runstream File: E:\WD Passport\sunset_everett\model\SETUP2_2010-2016_OTHER.DTA

**Output Print File: E:\WD Passport\sunset_everett\model\SETUP2_2010-2016_OTHER.LST

**File for Summary of Results: E:\WD Passport\sunset_everett\model\SETUP2_2010-2016_OTHER.SUM

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*** AERMOD - VERSION 23132 ***      *** Sunset and Everett ***      05/14/24
*** AERMET - VERSION 16216 ***      *** Diesel Particulates / Trenching_Building Construction_Architectural *** 12:25:16
                                                                                                     PAGE 2
*** MODELOPTs:  RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

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*** METEOROLOGICAL DAYS SELECTED FOR PROCESSING ***
(1=YES; 0=NO)

[illegible]

NOTE: METEOROLOGICAL DATA ACTUALLY PROCESSED WILL ALSO DEPEND ON WHAT IS INCLUDED IN THE DATA FILE.

*** UPPER BOUND OF FIRST THROUGH FIFTH WIND SPEED CATEGORIES ***
(METERS/SEC)

1.54, 3.09, 5.14, 8.23, 10.80,

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*** AERMOD - VERSION 23132 ***      *** Sunset and Everett ***      05/14/24
*** AERMET - VERSION 16216 ***      *** Diesel Particulates / Trenching_Building Construction_Architectural ***      12:25:16
                                                                                                     PAGE 3
*** MODELOPTs:  RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

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*** UP TO THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

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Surface file:  E:\WD Passport\sunset_everett\metdata\CELA_v9.SFC           Met Version:  16216
Profile file:  E:\WD Passport\sunset_everett\metdata\CELA_v9.PFL
Surface format: FREE
Profile format: FREE
Surface station no.:  99999          Upper air station no.:  3190
                        Name: UNKNOWN                        Name: UNKNOWN
                        Year:  2010                          Year:  2010

```

First 24 hours of scalar data																						
YR	MO	DY	JDY	HR	H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O	LEN	Z0	BOWEN	ALBEDO	REF	WS	WD	HT	REF	TA	HT
10	01	01	1	01	-33.0	0.331	-9.000	-9.000	-999.	456.	120.2	0.56	0.86	1.00	3.10	38.	21.3	284.9	17.7			
10	01	01	1	02	-26.9	0.285	-9.000	-9.000	-999.	367.	89.6	0.56	0.86	1.00	2.70	38.	21.3	284.2	17.7			
10	01	01	1	03	-38.6	0.387	-9.000	-9.000	-999.	577.	164.6	0.56	0.86	1.00	3.60	35.	21.3	284.2	17.7			
10	01	01	1	04	-33.0	0.331	-9.000	-9.000	-999.	458.	120.2	0.56	0.86	1.00	3.10	34.	21.3	283.8	17.7			
10	01	01	1	05	-33.1	0.331	-9.000	-9.000	-999.	456.	120.2	0.56	0.86	1.00	3.10	37.	21.3	283.1	17.7			
10	01	01	1	06	-38.7	0.387	-9.000	-9.000	-999.	577.	164.5	0.56	0.86	1.00	3.60	24.	21.3	283.1	17.7			
10	01	01	1	07	-38.6	0.387	-9.000	-9.000	-999.	577.	164.5	0.56	0.86	1.00	3.60	35.	21.3	283.8	17.7			
10	01	01	1	08	-29.6	0.435	-9.000	-9.000	-999.	688.	251.8	0.56	0.86	0.55	4.00	35.	21.3	283.8	17.7			
10	01	01	1	09	30.0	0.426	0.367	0.008	59.	666.	-232.0	0.56	0.86	0.32	3.60	38.	21.3	286.4	17.7			
10	01	01	1	10	72.3	0.359	0.629	0.008	124.	519.	-57.8	0.56	0.86	0.24	2.70	34.	21.3	290.4	17.7			
10	01	01	1	11	104.4	0.321	0.998	0.008	344.	437.	-28.6	0.56	0.86	0.21	2.20	43.	21.3	292.5	17.7			
10	01	01	1	12	115.1	0.283	1.156	0.008	484.	363.	-17.9	0.56	0.86	0.20	1.80	62.	21.3	295.9	17.7			
10	01	01	1	13	91.4	0.406	1.130	0.008	568.	622.	-66.2	0.56	0.86	0.20	3.10	263.	21.3	294.2	17.7			
10	01	01	1	14	89.3	0.316	1.168	0.008	642.	432.	-31.9	0.56	0.86	0.21	2.20	259.	21.3	294.9	17.7			
10	01	01	1	15	42.6	0.295	0.928	0.008	675.	384.	-54.0	0.56	0.86	0.25	2.20	267.	21.3	294.9	17.7			
10	01	01	1	16	12.0	0.359	0.609	0.008	680.	516.	-347.9	0.56	0.86	0.33	3.10	264.	21.3	292.5	17.7			
10	01	01	1	17	-15.7	0.231	-9.000	-9.000	-999.	276.	70.7	0.56	0.86	0.60	2.20	288.	21.3	290.9	17.7			
10	01	01	1	18	-6.1	0.135	-9.000	-9.000	-999.	124.	36.7	0.56	0.86	1.00	1.30	344.	21.3	289.2	17.7			
10	01	01	1	19	-11.4	0.184	-9.000	-9.000	-999.	190.	49.2	0.56	0.86	1.00	1.80	2.	21.3	288.8	17.7			
10	01	01	1	20	-17.4	0.229	-9.000	-9.000	-999.	263.	62.1	0.56	0.86	1.00	2.20	22.	21.3	288.1	17.7			
10	01	01	1	21	-17.4	0.229	-9.000	-9.000	-999.	263.	61.9	0.56	0.86	1.00	2.20	40.	21.3	287.0	17.7			
10	01																					

First hour of profile data

YR	MO	DY	HR	HEIGHT	F	WDIR	WSPD	AMB	TMP	sigmaA	sigmaW	sigmaV
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10 01 01 01 17.7 0 -999. -99.00 284.9 99.0 -99.00 -99.00
10 01 01 01 21.3 1 38. 3.10 -999.0 99.0 -99.00 -99.00

F indicates top of profile (=1) or below (=0)

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Trenching_Building Construction_Architectural *** 12:25:16
PAGE 4

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** THE SUMMARY OF MAXIMUM ANNUAL RESULTS AVERAGED OVER 5 YEARS ***

** CONC OF OTHER IN MICROGRAMS/M**3 **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZHILL, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS 0.31642 AT (384679.00, 3770421.90, 129.29, 183.69, 0.00)	DC		
	2ND HIGHEST VALUE IS 0.25925 AT (384679.80, 3770430.00, 130.10, 183.69, 0.00)	DC		
	3RD HIGHEST VALUE IS 0.25859 AT (384686.70, 3770422.00, 130.73, 183.69, 0.00)	DC		
	4TH HIGHEST VALUE IS 0.23714 AT (384681.50, 3770453.50, 133.03, 183.69, 0.00)	DC		
	5TH HIGHEST VALUE IS 0.23440 AT (384682.70, 3770469.80, 136.38, 183.69, 0.00)	DC		
	6TH HIGHEST VALUE IS 0.23283 AT (384680.20, 3770437.70, 130.91, 183.69, 0.00)	DC		
	7TH HIGHEST VALUE IS 0.23147 AT (384682.30, 3770461.40, 135.13, 183.69, 0.00)	DC		
	8TH HIGHEST VALUE IS 0.22991 AT (384683.50, 3770477.70, 137.53, 183.69, 0.00)	DC		
	9TH HIGHEST VALUE IS 0.22909 AT (384681.00, 3770446.00, 131.99, 183.69, 0.00)	DC		
	10TH HIGHEST VALUE IS 0.22229 AT (384684.00, 3770486.00, 138.85, 183.69, 0.00)	DC		

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR

*** AERMOD - VERSION 23132 *** *** Sunset and Everett *** 05/14/24
*** AERMET - VERSION 16216 *** *** Diesel Particulates / Trenching_Building Construction_Architectural *** 12:25:16
PAGE 5

*** MODELOPTs: RegDFAULT CONC ELEV NODRYDPLT NOWETDPLT URBAN ADJ_U*

*** Message Summary : AERMOD Model Execution ***

----- Summary of Total Messages -----

A Total of 0 Fatal Error Message(s)
A Total of 4 Warning Message(s)
A Total of 808 Informational Message(s)

A Total of 43824 Hours Were Processed

A Total of 4 Calm Hours Identified

A Total of 804 Missing Hours Identified (1.83 Percent)

***** FATAL ERROR MESSAGES *****
*** NONE ***

***** WARNING MESSAGES *****
ME W186 1290 MEOPEN: THRESH_1MIN 1-min ASOS wind speed threshold used 0.50
ME W187 1290 MEOPEN: ADJ_U* Option for Stable Low Winds used in AERMET
MX W450 17521 CHKDAT: Record Out of Sequence in Meteorological File at: 14010101
MX W450 17521 CHKDAT: Record Out of Sequence in Meteorological File at: 2 year gap

ATTACHMENT E

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26. United States Environmental Protection Agency, National Center for Environmental Assessment, 2018. Integrated Risk Information System (IRIS). Diesel Engine Exhaust.

Exhibit B

Signal Warrant Analysis

Memorandum

Date: May 2024

To: Jeff Farrington, Aragon Properties, & Dana Sayles, three6ixty

From: John Muggridge and Andrew Jarnagin, Fehr & Peers

Subject: Signal Warrant Analysis for Sunset Boulevard / Everett Street

LA23-3441

Responding to community concerns regarding the proposed construction of the Sunset+Everett Project at 1185 Sunset Boulevard, a signal warrant analysis was conducted for the Sunset Boulevard / Everett Street intersection for determination on the need for a traffic signal at this location. The satisfaction of a traffic signal warrant does not itself require the installation of a signal, and other factors relative to safety, traffic flow, signal spacing, coordination, etc. should be considered. This memorandum summarizes the results of the signal warrant analysis and considers other factors for installing a signal.

Signal Warrant Analysis

A signal warrant analysis was conducted for the Sunset Boulevard / Everett Street intersection to see if it would trigger the potential need for a traffic signal. Using the Manual on Uniform Traffic Control Devices (MUTCD), the intersection was tested to see if its volumes meet signal warrants. The peak hour signal warrant was used for this analysis, and it is intended for use at a location where traffic conditions are such that for a minimum of 1 hour of an average day, the minor-street traffic suffers undue delay when entering or crossing a major street. The traffic counts used for this signal warrant analysis were collected in May 2023.

The Sunset Boulevard / Everett Street intersection **does not trigger the signal warrant under the Future (2027) Plus Project condition in either the AM or PM peak hours.** Analysis sheets for signal warrants can be found in **Attachment A.**



Other Considerations

Sunset+Everett Project Trips

The Sunset+Everett project would have three driveways for vehicular access to the site, all of which are on Sunset Boulevard. The project would have no vehicular access via Everett Street. Additionally, the project is not forecasted to generate any new trips on Everett Street, which is a dead-end street with largely residential uses and would therefore not contribute to the minimum vehicle volume required to trigger a peak hour signal warrant on Everett Street.

Roadway Geometries

Due to the offset approaches of the Everett Street and Boylston Street intersections with Sunset Boulevard, a potential traffic signal would likely require split phasing (separate and exclusive green phases for Everett Street and Boylston Street, respectively), which necessitates a larger share of the cycle length to be dedicated to the side street approaches, thus increasing vehicular delay on Sunset Boulevard. Additionally, a potential traffic signal would be in close proximity (~325') to the existing signal at Marion Avenue.



Attachment A – Singal Warrant Analysis Sheets



Major Street	Sunset Boulevard
Minor Street	Everett Street

Project	Sunset+Everett Project
Scenario	Future Plus Project
Peak Hour	AM

Turn Movement Volumes

	NB	SB	EB	WB
Left	0	27	0	26
Through	1,203	2,095	0	11
Right	23	0	0	41
Total	1,226	2,122	0	78

Major Street Direction

x	North/South
	East/West

Intersection Geometry

Number of Approach Lanes for Minor Street	1
Total Approaches	3

Worst Case Delay for Minor Street

Stopped Delay (seconds per vehicle)	43.7
Approach with Worst Case Delay	WB
Total Vehicles on Approach	78

Warrant 3A, Peak Hour			
	Peak Hour Delay on Minor Approach (vehicle-hours)	Peak Hour Volume on Minor Approach (vph)	Peak Hour Entering Volume Served (vph)
Future Plus Project	0.9	78	3,426
Limiting Value	4	100	650
Condition Satisfied?	Not Met	Not Met	Met
Warrant Met	<u>NO</u>		



Major Street Sunset Boulevard
 Minor Street Everett Street

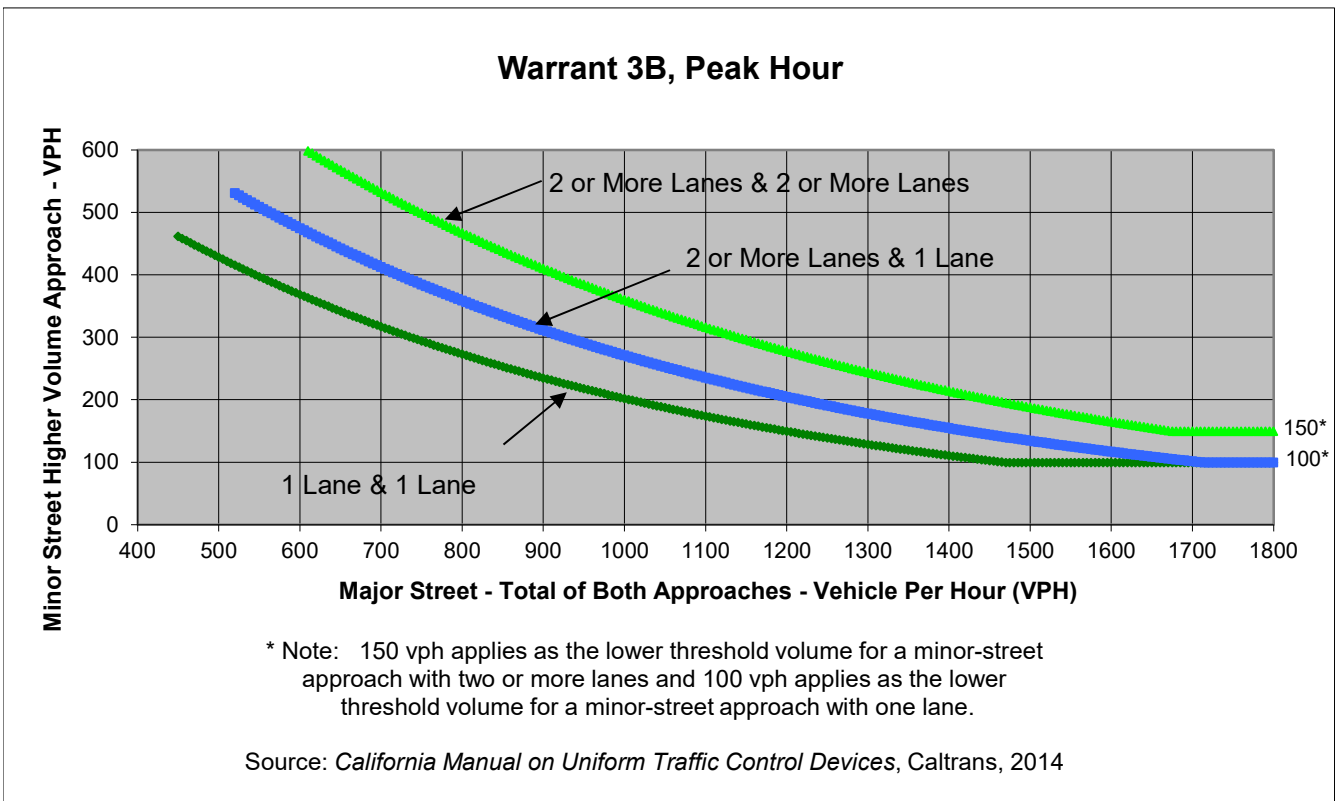
Project Sunset+Everett Project
 Scenario Future Plus Project
 Peak Hour AM

Turn Movement Volumes

	NB	SB	EB	WB
Left	0	27	0	26
Through	1203	2095	0	11
Right	23	0	0	41
Total	1,226	2,122	0	78

Major Street Direction

x	North/South
	East/West



	Major Street	Minor Street	Warrant Met
	Sunset Boulevard	Everett Street	
Number of Approach Lanes	4	1	<u>NO</u>
Traffic Volume (VPH) *	3,348	78	
* Note: Traffic Volume for Major Street is Total Volume of Both Approches. Traffic Volume for Minor Street is the Volume of High Volume Approach.			



Major Street	Sunset Boulevard
Minor Street	Everett Street

Project	Sunset+Everett Project
Scenario	Future Plus Project
Peak Hour	PM

Turn Movement Volumes

	NB	SB	EB	WB
Left	0	61	0	14
Through	1,807	1,448	0	5
Right	45	0	0	39
Total	1,852	1,509	0	58

Major Street Direction

x	North/South
	East/West

Intersection Geometry

Number of Approach Lanes for Minor Street	1
Total Approaches	3

Worst Case Delay for Minor Street

Stopped Delay (seconds per vehicle)	65.1
Approach with Worst Case Delay	WB
Total Vehicles on Approach	58

Warrant 3A, Peak Hour			
	Peak Hour Delay on Minor Approach (vehicle-hours)	Peak Hour Volume on Minor Approach (vph)	Peak Hour Entering Volume Served (vph)
Future Plus Project	1	58	3,419
Limiting Value	4	100	650
Condition Satisfied?	Not Met	Not Met	Met
Warrant Met	<u>NO</u>		

Major Street Sunset Boulevard
Minor Street Everett Street

Project Sunset+Everett Project
Scenario Future Plus Project
Peak Hour PM

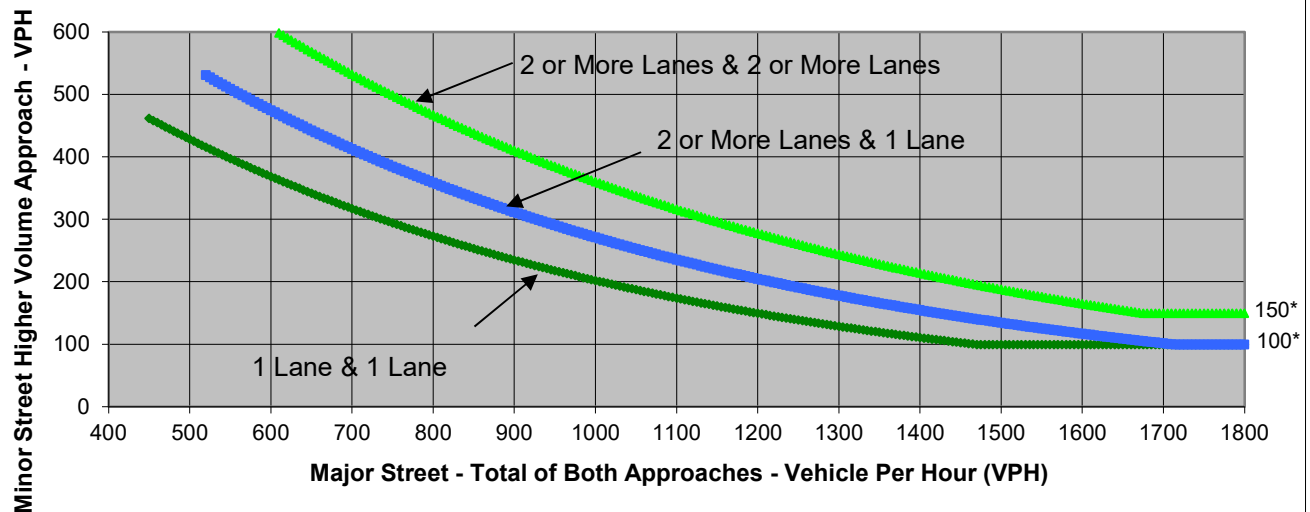
Turn Movement Volumes

	NB	SB	EB	WB
Left	0	61	0	14
Through	1807	1448	0	5
Right	45	0	0	39
Total	1,852	1,509	0	58

Major Street Direction

x	North/South
	East/West

Warrant 3B, Peak Hour



* Note: 150 vph applies as the lower threshold volume for a minor-street approach with two or more lanes and 100 vph applies as the lower threshold volume for a minor-street approach with one lane.

Source: *California Manual on Uniform Traffic Control Devices*, Caltrans, 2014

	Major Street	Minor Street	Warrant Met
	Sunset Boulevard	Everett Street	
Number of Approach Lanes	4	1	<u>NO</u>
Traffic Volume (VPH) *	3,361	58	
* Note: Traffic Volume for Major Street is Total Volume of Both Approches. Traffic Volume for Minor Street is the Volume of High Volume Approach.			

Exhibit C

Biological Response to Comments

June 4, 2024

Stephanie DeHerrera

Rand Paster Nelson

Email: stephanie@rpnllp.com

RE: Responses to Public Comments to the Sustainable Communities Environmental Assessment (SCEA) for the Sunset and Everett Project in Los Angeles, California

Dear Stephanie:

This letter includes responses to public comments in a project specific environmental document for the Sunset and Everett Project (project) in Los Angeles, California. The project is a proposed mixed-use development at the intersection of Sunset Boulevard and Everett Street in an area that also extends north along Sunset Boulevard. The development includes sixteen lots assigned to Assessor Parcel Number 540-601-6036 in a previously developed lot that currently contains ruderal and landscaped plants in a densely urbanized area.

Regulatory Background

The State of California created the Sustainable Communities and Climate Protection Act of 2008 (SB 375) to help regional land use and transportation planning strategies meet California's greenhouse gas (GHG) emission reduction mandates set by the California Air Resources Board (CARB). SB 375 allows cities to act as lead agency for projects that qualify as transit priority projects (TPPs) and are consistent with the 2020-2045 RTP/SCS. Lead agencies are allowed to prepare a Sustainable Communities Environmental Assessment (SCEA) in lieu of CEQA documents. Identical to the requirement of CEQA, a SCEA for TPPs requires an initial and comprehensive environmental study to identify potential impacts. The SCEA for a TPP must also contain mitigation measures that either avoid, or mitigate to a level of insignificance, all potential impacts.

Project Background

The project qualifies as a TPP, and in March of 2024, the City of Los Angeles completed an SCEA for the project that included an analysis of potential impacts to Biological Resources. Potential impacts, avoidance measures, and mitigation measures are recorded within *Section 5 – Evaluation of Environmental Impacts* of the SCEA. The findings of the SCEA Section 5.1.4 regarding Biological Resources impacts were that the project would have a "Less Than Significant

Impact” on subsections 5.1.4.b-e and no impact to subsection 5.1.4.f. However, the findings for Section 5.1.4.a were that the project would have a “Less Than Significant with Mitigation Incorporated” due to the potential for nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code to be impacted by the development during removal of onsite vegetation and ground disturbance. The SCEA proposes mitigation that includes preconstruction surveys for nesting birds and avoidance of impacts to active nests using no-work buffers to ensure that no impacts to nesting birds would occur, and to ensure the project compliance with the MBTA and Fish and Game Code.

The SCEA was open to public comment for a period of 30 days. The public comment included a letter dated April 11, 2024 that was prepared by Shawn Smallwood, Ph.D. regarding *Section 5.1.4 Biological Resources* of the SCEA. The Smallwood Letter asserts that the special-status species impacts for the project in Section 5.1.4.a would be much greater than shown by the City of Los Angeles. According to Dr. Smallwood’s letter, the submitted SCEA did not mitigate biological impacts to less than significant levels; and asserts that a project specific CEQA review is required.

South Environmental has prepared this letter as an assessment of the claims from Dr. Smallwood. This letter includes a response to assertions regarding Section 5.1.4.a and specifically assesses claims made in the letter regarding the potential impacts to special-status species and the adequacy of the proposed mitigation measures in the SCEA.

Site Conditions

The property is located at 1185 W Sunset Boulevard in the Echo Park neighborhood of Los Angeles near Dodger Stadium. The site is within a densely urbanized area with houses, buildings, and roads surrounding the site. There are no undeveloped open spaces near the site. According to historicaerials.com the site was entirely developed as far back as 1952 and remained entirely developed until 2021 when the existing developments were demolished in preparation for the proposed new development. Currently, the site has remnants of the developments including concrete pads, concrete retaining walls, trash and debris, and perimeter fencing. Based on photos in the Smallwood letter, and the description within the project arborist report the site has ruderal vegetation and includes several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds that dominate the site. The arborist report found that no protected native trees occur and that seven non-native Mexican fan palm (*Washingtonia robusta*) occur as street trees that would be protected and avoided by the project impacts. The site lacks any wetlands or streams or other water features, it is set in a densely urbanized area with no connectivity to any open space or native habitats, and the lot has been previously developed for decades until recently.

Responses to Public Comments

Dr. Smallwood concludes that the project will adversely affect special-status species through direct habitat loss and these impacts should be analyzed in a project specific CEQA document. Specifically, the letter states that four special-status species (Allen's hummingbird, California gull, Cooper's hawk, and red-tailed hawk) occur on the site based on a single survey and that "the evidence is overwhelming that the project site provides habitat for protected species identified as candidate, sensitive, or species of special status" and presents a table of nearly one hundred species known to occur in the region as an indication of the potential high value to special-status species. The comment suggests that the aerosphere above the project site is considered special-status species habitat.

Response: The Smallwood letter fails to understand that the project site lacks native habitats that would be able to support special status species. The letter also incorrectly assumes that birds observed indicates use of the site and incorrectly labels identified birds as special-status when they are not. CEQA asks if the project would have "a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species" and they have not provided any evidence that the area is habitat for any special-status species. Considering that the project site lacks any substantial coverage of native plants, was recently entirely developed, has heavy disturbances that remain from the past development, and the site is overwhelmingly dominated by invasive plants such as tree-of-heaven, the site is characterized as a disturbed area with ruderal and invasive vegetation and would not be characterized as a native plant community or habitat for special-status species. Special-status species require native habitats to survive, and the site lacks native habitats. Invasive plants and developments heavily degrade and outcompete native plants and result in an area that is not able to support special-status species. The lack of native plants and native habitats indicates that special-status species would not use the site as habitat capable of supporting the life history of any special-status species. Special-status species often avoid areas where humans are found and urbanized areas are not considered habitat for special-status species.

Below is a discussion of the four special-status species Dr. Smallwood indicates in his letter would use the site as habitat.

- California gull (*Larus californicus*) was observed during Ms. Smallwood's survey flying over the site. The California gull is listed on the CDFW Special Animals List as a CDFW Watchlist species and a US Fish and Wildlife Service (USFWS) Bird of Conservation Concern (BCC), but only as a nesting colony. A single gull is not considered special-status and only the nesting colony would hold a special-status. Therefore, a single bird flying over the site does not indicate the area is habitat for this species, and no nesting colony was found on

the site. According to the Cornell University Ornithology Lab website *All About Birds*, California gull nesting colonies would be found on “sparsely vegetated islands and levees in inland lakes and rivers” as well as in salt ponds near San Francisco, and breeding colonies are “usually surrounded by water”. There are no lakes, rivers, or other water features on or near the site and there is no potential for California gull nesting colonies to occur on the site or in the aerosphere. Therefore, the project would not impact habitat for nesting colonies of California gull and no impacts to habitat for special-status nesting colonies would occur.

- Allen’s hummingbird (*Selasphorus sasin*) was observed perched and being territorial on the site. Allen’s hummingbird is not on the CDFW Special Animals List, but is considered a USFWS BCC due to its limited range. There is a subspecies of this bird that is found on the Channel Islands and nearby mainland that is known to occur in coastal forest, scrub, and chaparral habitats but can also be found in disturbed areas. The females tend to nest in areas with cover from eucalyptus trees, which is not found on the site. Disturbed areas are not the typical native habitat of the species, and landscaping and other invasive vegetation is not considered habitat for special-status species because native plant communities are those protected by CEQA. While this species was found on the project site, it is becoming more common in landscaping and urban settings, but landscaping and urban disturbed areas would not be considered protected habitat and the ruderal vegetation on the project site would not be considered high value for this species as there are many areas with landscaping and ruderal species. Ruderal areas and landscaping such as found on the project are not sensitive plant communities that are at risk and the project would not substantially alter or change the availability of ruderal and disturbed areas that this species could use. This species is currently expanding its range into Los Angeles and San Diego and replacing the more abundant Anna’s hummingbird due to the ability to inhabit parks and other landscaped areas such as university campuses. Because the project site does not contain native habitats, nor would it jeopardize the availability of ruderal and invasive plant coverage, the project would not have a substantial impact on habitat for this species according to CEQA. Finally, the aerosphere is not considered habitat for this species.
- Red-tailed hawk (*Buteo jamaicensis*) was observed flying over the site. This species is not on the CDFW Special Animals List and is not considered a special-status species. Dr. Smallwood asserts that this is a Bird of Prey and is therefore has a special status. While the species is protected by the MBTA and Fish and Game code (which protects all birds of prey), the category of bird known as birds of prey is not a designation that indicates special-status. Therefore, the fact that this species was observed flying over the site does

not indicate that the site itself is habitat for special-status species, as this is not a special-status species, and it is not known to use the site in any way.

- Cooper's hawk (*Accipiter cooperii*) was observed flying over the site. Cooper's hawk is a CDFW Watchlist species indicating that it is not a special-status species but could become special-status if habitat is lost and it declines to a level that it is at risk of persisting. Not only was this species not observed using the site in any way other than flying over, but this species is also often found in urban areas as a forager. Typically, this species would nest in forest and woodlands, often associated with riparian areas, but it is also common in suburban areas with tree coverage. Not only is this species not considered special-status but the project would not have a substantial impact on woodlands or forest, and would not have a substantial impact on suburban tree coverage in the area or region and habitat for this species would not be put in jeopardy by the project. Loss of urbanized areas with invasive plants would not be considered a significant impact to habitat for this species according to CEQA thresholds.

It should be noted that the SCEA for the project has incorporated mitigation to avoid impacts to nesting birds and the project would have no impact on nesting birds protected by the MBTA and fish and game code, including those listed above and those identified in Dr. Smallwood's letter. The proposed mitigation in the SCEA is adequate to avoid impacts to these birds identified on the site and no additional mitigation would be necessary to avoid significant impacts. The lack of native habitats and habitat special-status species as assessed above indicates that the project would have a less than significant impact on birds protected by the MBTA and no impact to habitat for special-status species would occur.

Dr. Smallwood continues in the letter to assert that other special-status species could inhabit the site, but they simply were not observed. However, he provides no evidence of this other than the statement that these species are known to occur in the county or within 1.5-miles of the site. Dr. Smallwood ignores the lack of native plant communities and provides no assessment of the degraded habitat on the project site, and simply asserts that the habitat value is high due to the presence of common urban birds. The site lacks habitat for special-status species for the reasons stated above. Urbanized areas dominated by invasive plants are not protected by CEQA because these are not habitat for special-status species. No water occurs on the site and therefore, no waterfowl, fish, amphibians, or bats that require a permanent water source would occur. In fact, the lack of native plant communities indicates that the special-status species that occur in the county would be absent due to lack of habitat. Invasive plant coverage such as the tree of heaven on the site is indicative of an area that is more likely to contribute to the spread of invasive species to the detriment of native habitats that special status wildlife would be found in. An assertion that special-status species known to occur in native habitats near the site indicates that

they would also occur on the site is false and is not based on any analysis of the habitat requirements of these species.

Dr. Smallwood questions the sufficiency of the mitigation measures for the protection of potential bats on the project site, stating that since no survey was conducted for the presence of bats that construction monitoring would be implemented too late to protect bats. No detection survey is required in this case due to the lack of sufficient habitat for bats or a bat roost. Bats require sufficient foraging area and a permanent water source to support a roost. Bats are also averse to human activity and will avoid it when possible. The project site lacks a permanent water source, and the surrounding urbanization makes the area unattractive for foraging due to increased human activity. Due to this lack of habitat or wider foraging space within the surrounding area, no detection survey for bats is called for. Any bats that would occur on the project site would likely be stopping over or flying through, in which case a detection survey conducted long before construction began would be entirely ineffective. The mitigation measures already included in the SCEA are sufficient to protect any bats onsite from significant impact.

Additionally, Dr. Smallwood presents a method for determining a total number of expected species on the site, concluding based on the 30 species observed at the site over a 2.82-hour period that a total of 81 species are likely to occur there. This method is based on data from the Altamont Pass Wind Resource Area, where Dr. Smallwood conducted a study over 167 km² of annual grasslands. As this study was conducted approximately 326 miles away from the project site and occurred in a very large area of annual grasslands instead of an urban environment it holds little relevance to the expected species at the project site. This methodology does not consider the habitat conditions on the site and within the region and cannot be used to make claims about potential special-status species that may occur.

Dr. Smallwood indicates that numerous other birds would occur on the site, many of which are not special status despite his assertion that they are. Birds of prey are not special-status species and are not on the CDFW Special Animals List. The birds Dr. Smallwood states would be impacted by the project would be avoided by the implementation of the proposed nesting bird surveys and avoidance measures already included in the SCEA. The lack of native habitats indicates that the project does not pose a significant risk to habitat for special status species because they require native habitats and are not found in areas dominated by invasive plants. Therefore, the SCEA findings that the project would not impact special-status species or their habitat is correct. The proposed mitigation is suitable and adequate to avoid impacts to any nesting birds on the site and no additional analysis is necessary to draw that conclusion.

Dr. Smallwood concludes that the project will adversely affect special-status species through window collisions due to extensive glazing. Dr. Smallwood predicts that the project will cause 760 bird deaths annually due to window collisions alone. Dr. Smallwood proposes several mitigation measures that could reduce the project's impact to special-status species, including the use of bird-safe glass. He asserts that these impacts and mitigation should be analyzed in a project specific CEQA document.

Response: The impact of tall building collisional bird deaths is a known concern of buildings in general. One study on collisional deaths at a low-rise building in Chicago found that collisions had a positive relationship with the percentage of lit area of the building and mostly impacted songbirds.¹ This analysis also found that colliding birds were attracted to specific light sources and were not simply disoriented by overall city sky glow, and therefore, a single buildings lighting effects would be diminished when set within an already lit area such as the project site. The proposed project, like all buildings, will result in some level of collisional bird deaths. However, the project site is in a densely urbanized area with tall buildings, and songbirds would not be expected to be particularly attracted to the project given the existing conditions. Further, these sporadic deaths will not endanger the urban songbird population as the area is already well lit and no native habitat or bird nesting habitat occurs on or near the project site. Special-status species would not be attracted to the site nor would they be migrating at a low elevation over the site as there are no native habitats within many miles of the site, only dense urban development occurs in all directions indicating that special-status species would avoid the project site and surrounding areas. These minimal bird collision deaths would be at such a low rate as to not alter the trajectory of bird populations beyond the existing conditions and would therefore not be significant according to CEQA.

Additionally, studies find that glass that reflects vegetation is more likely to cause bird strikes due to the perceived open space and foraging area that the glass reflects.² Therefore, buildings with extensive landscaping may be more likely to cause bird strikes than those with sparse landscaping. The current building plans for the project show landscaping comprised of several street trees and low-lying shrubs, which is not particularly dense for the area. The Elysian Apartments, a mere 250 feet away from the project site possesses both floor to ceiling windows and extensive amounts of greenery around the approximately 125-foot-tall building. With the current project plans for landscaping the amount of bird strikes are unlikely to be significantly higher than other buildings in the area and do not pose a threat to the local bird populations.

¹ Van Doren, B.M., et al. (2021), Drivers of fatal bird collisions in an urban center. *Proceedings of the National Academy of Sciences USA* **118**.

² Klem, D. Jr., C. J. Farmer, N. Delacretaz, Y. Gelb and P.G. Saenger. (2009), Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment. *Wilson Journal of Ornithology* 121(1): 126-134

While, surrounding vegetation is a contributing factor to bird strike deaths, the habitat immediately surrounding the building is also a great contributor. Birds are attracted to vegetation and resources that they use for foraging, perching, and nesting. As the surrounding area of the project site is completely urbanized it is already less attractive for birds that would be flying through in search of resources.

Finally, the proposed mitigation measures to reduce bird strikes are not necessary because the potential impacts from bird collisions is already a less than significant impact. The proposed nesting bird surveys and nest avoidance would result in no impacts to nesting birds protected by the MBTA and Fish and Game Code and no additional mitigation measures are required to reduce the potential impacts as they would be less than significant. Special-status species avoid urbanized areas and use native plant communities not found on the project site. Therefore, the building would not pose a substantial risk of strikes to special-status species because they are not attracted to the site and would be migrating to and from areas of native habitats far outside of the dense urban areas of the project site.

Dr. Smallwood's letter states that the impacts of habitat loss are not analyzed by City of Los Angeles (2024), because the City concluded without evidence that the site does not support wildlife. However, wildlife *do* occur on the site because the site provides habitat. It is my opinion that the impacts of habitat loss would be significant. A fair argument can be made for the need to prepare and EIR to appropriately analyze the impacts of habitat loss and to formulate appropriate mitigation measures.

Response: The statement from Dr. Smallwood does not consider the CEQA thresholds as the basis for environmental assessment. The SCEA does not conclude that the site does not support wildlife as it recognizes the potential for nesting birds to occur there and then proposes mitigation to avoid impacts according to the requirements of the MBTA and Fish and Game Code. In addition, CEQA thresholds of significance regarding wildlife habitat are as follows: Does the project have "a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species". CEQA does not ask if habitat for any wildlife would be affected, but only if the project has a substantial affect on habitat for special-status species. As described previously the site lacks native habitats. Considering that the project site lacks any substantial coverage of native plants, was recently entirely developed and has heavy disturbances that remain from the past development, and the site is overwhelmingly dominated by invasive plants such as tree-of-heaven, the site is characterized as a disturbed area with ruderal and invasive vegetation and would not be characterized as a native plant community or habitat for special-status species. Special-status species require native habitats to survive, and the site lacks native habitats. Invasive plants and developments heavily degrade and outcompete native plants and result in an area that is not able to support special-status species. CEQA or the

SCEA would not consider the impacts to invasive plants to be considered a significant environmental impact.

The comment letter states that the SCEA (page 5-71) claims that adherence to its mitigation requirements “would ensure that the Project would not interfere substantially with the movement of any native resident or migratory ... wildlife species...” However, the insertion of a long reach of 85-91-foot-tall glass-fronted buildings onto existing stopover and fly-through habitat would most certainly interfere with wildlife movement. Not only would the buildings present birds, bats and butterflies with substantial barriers to volant movement, but interior lighting would escape the large-panel windows, which would distract many avian nocturnal migrants, and which would increase bird collision risk. Depictions of the buildings appear to highlight the project’s emissions of interior light. The project would interfere with wildlife movement while also introducing considerable bird-window collision risk.

Response: Migrating birds regularly fly at altitudes of several thousand feet. At this vertical distance the building poses no risk to migrating birds and light from the proposed project will have degraded to negligible amounts due to the angle of the light and extreme distance. Therefore, it is unlikely that the proposed project will alter bird migration patterns over the already urbanized landscape. In addition, the assertion that the project site is within a significant wildlife movement area is not correct. This area of Los Angeles is densely urbanized and has numerous large buildings. The nearest substantial open space would be within Griffith Park approximately 3-miles from the project site. The areas between the project site and Griffith Park are densely urbanized. The site is surrounded by urbanization in all directions and has no direct or indirect connection to habitat areas and provides no linkage opportunities or opportunities for wildlife to move through the urbanized area. There are no significant migratory stopover locations on the site or in the surrounding areas, and following the project development there would be no reason for migrating birds to attempt to stop anywhere near the site. Migrating wildlife would not be found at the site due to urbanization and wildlife would typically avoid this area due to the potential hazards from cars and people. Therefore, the project would not create any barriers or deterrents to migrating or moving wildlife. The area is already well lit and entirely developed and light would not spill onto any open space or native habitats. The project would have no interference with wildlife movement as the area lacks movement corridors and dense urban development is not considered a wildlife movement corridor.

Conclusion

The project site is a disturbed area characterized by invasive plant cover such as tree of heaven. The site lacks native plant communities and has no habitat for special-status species. Not only is

Dr. Smallwood incorrect about the status of the species observed on the site, he provides no evidence that the site has any of the characteristics of habitat that special-status species would find significant or useable. Birds flying over the site do not indicate use. Red-tailed hawk is not a special-status species, California gull does not use the site and only its nesting colonies are considered special-status, and these have no potential to occur at the site. Cooper's hawk is a Watchlist species and is therefore not considered special-status, Allen's hummingbird is often found in areas with disturbance, but CEQA does not consider invasive plants and urban landscaping to be significant habitat for special-status species. The project is not within a wildlife movement area or habitat linkage and is in one of the most densely urbanized areas in California. The proposed SCEA mitigation for nesting birds is adequate to avoid impacts to nesting birds protected by the MBTA and the Fish and Game Code (including red-tailed hawk, California gull, Cooper's hawk, and Allens's hummingbird), and no other potential impacts to biological resources would be anticipated due to the lack of sensitive resources and prevalence of disturbance, development, and invasive species. No additional mitigation measures would be necessary as no potential impacts as they pertain to the SCEA and CEQA thresholds are expected to occur.

If you have any questions regarding the information in this report, please contact Matthew South by email: msouth@southenvironmental.com or by mobile phone: 303-818-3632.

Sincerely,



Matthew R. South
Principal Biologist

List of Attachments

1. **Attachment A.** Section 5 – Evaluation of Environmental Impacts of the SCEA submitted by the City of Los Angeles
2. **Attachment B.** Smallwood Letter
3. **Attachment C.** Protected Tree Arborist Report
4. **Attachment D.** South Environmental Biologist's Resumes

Attachment A:

Section 5 – Evaluation of Environmental
Impacts of the SCEA submitted by the
City of Los Angeles

1.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section is based on the following item, which is included as **Appendix C** to this SCEA:

C Protected Tree Report, JTL Consultants, August 31, 2023

SCAG 2020–2045 RTP/SCS PEIR Mitigation Measures

PMM BIO-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as

applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
- b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat.
- c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.
- d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- h) Appoint a qualified biologist to monitor implementation of mitigation measures.
- i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

- j) Develop an invasive species control plan associated with project construction.
- k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife.
- l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.
- n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.
- o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species

Applicability to the Project

As discussed below, the Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area.

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard. The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.³⁰

The Project would result in the removal of existing trees from the Project Site as well as construction in close proximity to the existing street trees, where migratory birds and other species (e.g., bats) could potentially nest or roost. Accordingly, as discussed below in connection with **PMM BIO-4** and in conformance with the regulatory requirements of the Migratory Bird Treaty Act and California Fish and Game Code, the Project would implement Project-specific mitigation measure **MM-BIO-1** which would ensure that potential construction-related impacts on nesting birds would not occur. In addition, the Project would incorporate relevant measures from SCAG Mitigation Measure **PMM BIO-1** (specifically, **PMM BIO-1(g)** and **PMM BIO-1(i)**) that would be applicable to non-avian protected species (e.g., bats), and would ensure that potential impacts to such species would be reduced to less than significant levels. The remainder of the measures

³⁰ Protected Tree Report, JTL Consultants, August 31, 2023.

included in **PMM BIO-1** are not applicable to the Project due to the lack of other potential habitat on or in the vicinity of the Project Site.

PMM BIO-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA.
- b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino.
- c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code.
- d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.
- e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season.
- f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-bearing mammals, are actively using the areas in conjunction with breeding activities.
- g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors.

- h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required.
- i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities.
- j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures.
- k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects.
- m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan.
- n) Install fencing and/or mark sensitive habitat to be avoided during construction activities.
- o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist.
- p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist
- q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species).
- r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.

Applicability to the Project

As discussed below, no riparian or other sensitive natural community exists on the Project Site or in the surrounding area. Therefore, **PMM BIO-2** is not applicable to the Project.

PMM BIO-3: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency.

- a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible.
- b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW.
- c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation:
 - Permittee-responsible mitigation

- Contribution of in-kind in-lieu fees
 - Use of in-kind mitigation bank credits
 - Where avoidance is determined to be infeasible and
- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
- Avoidance
 - Impact Minimization On-site alternatives
 - On-site alternatives
 - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Therefore, the measures included in **PMM BIO-3** are not applicable to the Project.

PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.

- Contribution of in-kind in-lieu fees
 - Use of in-kind mitigation bank credits
 - Where avoidance is determined to be infeasible and
- d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities:
- Avoidance
 - Impact Minimization On-site alternatives
 - On-site alternatives
 - Off-site alternatives
- e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.

Applicability to the Project

As analyzed below, no water bodies or state and federally protected wetlands exist on the Project Site. Therefore, the measures included in **PMM BIO-3** are not applicable to the Project.

PMM BIO-4: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino.
- b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans.

- c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season.
- d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
- e) Prohibit construction activities within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- g) When feasible and practicable, proposed projects will be designed to minimize impacts to wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on and off-site.
- i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.
- k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore off-site habitat).
- l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation.

- n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction.
- o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable:
 - Wildlife movement buffer zones
 - Corridor realignment
 - Appropriately spaced breaks in center barriers
 - Stream rerouting
 - Culverts
 - Creation of artificial movement corridors such as freeway under or overpasses
 - Other comparable measures
- p) Where the lead agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions.
- q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.
- r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats.
- s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to:
 - Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting.

- Design exterior lighting to confine illumination to the project site
 - Provide structural and/or vegetative screening from light-sensitive uses.
 - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces.
 - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.
- t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to:
- Install temporary noise barriers during construction.
 - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.
 - Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.
 - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
 - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust

should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

- Using rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
 - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.
 - Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.
- u) Require large buffers between sensitive uses and freeways.
- v) Create corridor redundancy to help retain functional connectivity and resilience.

Applicability to the Project

As discussed above, consistent with **PMM BIO-4(e)** and **PMM BIO-4(f)** from the 2020–2045 RTP/SCS PEIR, the Project would implement the Project-specific mitigation measure **MM-BIO-1** to ensure that potential construction-related impacts on nesting birds would not occur, in compliance with the Migratory Bird Treaty Act and California Fish and Game Code. Due to the lack of habitat, habitat linkages, or wildlife corridors on or in the vicinity of the Project Site, the remainder of the measures identified under **PMM BIO-4** are not applicable to the Project.

PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources.

- b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist.
- c) If specific project area trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist.
- d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as “Protected Trees,” “Landmark Trees,” or “Heritage Trees,” to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed.
- e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree.
- f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree.
- g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist.

- h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources
- i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include:
 - Avoidance strategies
 - Contribution of in-lieu fees
 - Planting of replacement trees
 - Re-landscaping areas with native vegetation post-construction
 - Other comparable measures developed in consultation with local agency and certified arborist.

Applicability to the Project

As analyzed below, the Project would not conflict with any local policies or ordinances protecting biological resources. Furthermore, while the existing street trees adjacent to the Site are not a protected tree or shrub species, **Project Design Feature PDF-BIO-1** has been incorporated to identify the specific protections for these trees that will be implemented during Project construction activities. Thus, **PMM BIO-5** is not applicable to the Project.

PMM BIO-6: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

- a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs.

- b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP.
- c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.

Applicability to the Project

No Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Thus, **PMM BIO-6** is not applicable to the Project.

Impact Analysis

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less Than Significant With Mitigation Incorporated. The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.³¹ The tree-of heaven trees onsite are generally considered an invasive plant, rather than trees. These will be removed to accommodate the proposed buildings, and the Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).³²

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard. The seven Mexican fan palms on the Sunset Boulevard sidewalk will be protected during the development project by installing tree protection fencing around the trees, and the Project arborist will be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures.³³ These protective measures are identified by **Project Design Feature PDF-BIO-1** which has been incorporated into the Project:

³¹ Protected Tree Report, JTL Consultants, August 31, 2023.

³² Plans, KTG Architecture and Planning, February 6, 2024.

³³ Protected Tree Report, JTL Consultants, August 31, 2023.

Project Design Feature

PDF-BIO-1: Street Tree Protection

The Project Applicant/contractor shall install tree protection fencing around the seven Mexican fan palms on Sunset Boulevard to be protected. The Project Arborist shall be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures. The fencing shall be maintained throughout the grading and construction phase, and shall not be removed until the completion and cessation of all construction activities.

Migratory Birds

Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings. However, birds protected by the Migratory Bird Treaty Act may nest within the trees that would be removed as part of the Project.

The Migratory Bird Treaty Act prohibits the take, possession, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, of any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations. Additionally, California Fish & Game Code Section 3503 states that “[i]t is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.”

Consistent with the relevant measures associated with the Migratory Bird Treaty Act identified under **PMM-BIO-4**, the Project would implement **Mitigation Measure MM-BIO-1** to ensure potential construction-related impacts on nesting birds would not occur:

Mitigation Measure

MM-BIO-1: The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place.
- If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the

nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.

Bats

In addition to species covered under the Migratory Bird Treaty Act and the California Fish and Game Code, construction activities, including ground disturbance, vegetation removal, and increased noise and light levels, could have direct and/or indirect impacts on small terrestrial and avian species typically found in developed settings, such as bats, which sometimes use trees and man-made structures for roosting. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment. Specifically, Title 14, Section 251.1 of the California Code of Regulations, prohibits harassment (defined in that section as an intentional act that disrupts an animal's normal behavior patterns, including breeding, feeding, or sheltering) of nongame mammals, and California Fish and Game Code Section 4150, prohibits "take" or possession of all nongame mammals or parts thereof.

Any activities resulting in bat mortality, such as the destruction of an occupied bat roost that results in the death of bats; or disturbance that causes the loss of a maternity colony of bats, which may also result in the death of young bats; or various modes of nonlethal pursuit or capture may be considered "take" as defined in Section 86 of the California Fish and Game Code. While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities. Thus, construction activities could have a significant impact on bats, which are a protected species.

As discussed above, the 2020–2045 RTP/SCS PEIR MMRP contains mitigation measures that are to be implemented, as appropriate and feasible, if a lead agency determines that a project has the potential to result in significant environmental impacts pertaining to biological resources. These include **PMM BIO-1**, listed in detail above, which identifies measures to reduce substantial adverse effects related to threatened and endangered species and other special status species. As discussed above, **Mitigation Measure MM-BIO-1** will be implemented to address potential construction-related impacts to avian species in proximity to the Site. The Project would also incorporate the following mitigation measures from the 2020–2045 RTP/SCS PEIR MMRP to address potential impacts to non-avian protected species (e.g., bats):

RTP/SCS Mitigation Measures

- PMM BIO-1(g):** Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- PMM BIO-1(i):** Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.

Implementation of **Mitigation Measure MM-BIO-1** as well as **PMM BIO-1(g)** and **PMM BIO-1(i)** from the 2020–2045 RTP/SCS PEIR MMRP outlined above, would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the CDFW or USFWS. Thus, impacts would be less than significant with incorporation of mitigation measures.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

The Project Site is surrounded by a mix of low to mid-rise commercial and residential uses. No riparian or other sensitive natural community exists on the Project Site or in the surrounding area.^{34,35}

Furthermore, the Project Site and surroundings are not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.^{36,37}

In addition, there are no other sensitive natural communities identified by the CDFW or the USFWS.^{38,39}

Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and impacts would be less than significant.

34 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS) 6 website: <https://wildlife.ca.gov/Data/BIOS.gov/bios/>, accessed August 30, 2023.

35 United States Fish and Wildlife Service, National Wetlands Inventory (NWI), www.fws.gov/wetlands/data/Mapper.html, accessed August 30, 2023.

36 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3, and Navigate LA, Significant Ecological Areas layer: <http://navigate.lacity.org/navigate/>, accessed August 30, 2023.

37 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015: <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>, accessed August 30, 2023.

38 California Department of Fish and Wildlife, BIOS 6 website: <https://wildlife.ca.gov/Data/BIOS.gov/bios/>, accessed August 30, 2023.

39 California Department of Fish and Wildlife, CDFW Lands Viewer: website: <https://wildlife.ca.gov/Lands/Viewer>, accessed August 30, 2023.

- c) **Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Less Than Significant Impact. The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

No water bodies or state and federally protected wetlands exist on the Project Site.⁴⁰ The closest water feature is Echo Lake, which is classified as a Freshwater Pond and a small portion as Freshwater Emergent Wetland, approximately 3,000 feet west of the Site.⁴¹

As such, the Project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, and impacts would be less than significant.

- d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less Than Significant Impact. The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

In addition, the areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site that provide linkages to natural open spaces areas and that may serve as wildlife corridors.

Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City or County.^{42,43}

The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).⁴⁴ Existing trees on the Site will be removed to allow for construction of the Project. As discussed above, pursuant to **Mitigation Measure MM-BIO-1**, as outlined under Biological Resources, Threshold (a), tree removal activities associated with the Project would take place outside of the nesting season (February 1–August 31), to the extent feasible. Should vegetation removal activities occur during the nesting season, a qualified biologist would be present during the removal activities to ensure that no active nests would be impacted. If active

40 United States Environmental Protection Agency, NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed August 30, 2023.

41 U.S. Fish and Wildlife Service, NWI, www.fws.gov/wetlands/data/Mapper.html, accessed August 30, 2023.

42 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, p. 2-18-3.

43 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015: <https://planning.lacounty.gov/long-range-planning/general-plan/general-plan/>, accessed August 30, 2023.

44 Plans, KTG Architecture and Planning, February 6, 2024.

nests are found, a buffer would be established until determined by the biologist to no longer be active. The size of the buffer area varies with species and local circumstances (e.g., presence of busy roads) and would be based on the professional judgment of the monitoring biologist.

Adherence to these requirements would ensure that the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Impacts would be less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant. The City of Los Angeles Protected Tree and Shrub Relocation and Replacement Ordinance (Ordinance No. 177,404, as amended by Ordinance No. 186,873, adopted February 4, 2021) (Protected Tree and Shrub Ordinance) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, California bay trees, Mexican elderberry shrubs, and toyon shrubs, of at least 4 inches in diameter at 4.5 feet above the ground level at the base of the tree or shrub.⁴⁵ The Project Site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds.⁴⁶ Therefore, there is nothing onsite that constitutes a protected tree or shrub per City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.⁴⁷

The Project will provide 83 trees (82 trees on the ground level, including 14 street trees, and 1 tree on the roof deck).⁴⁸ As this is greater than the 82 on-site trees (4 trees per unit) required by LAMC Section 12.21 G.2(a)(3), the Project will not be required to utilize the provisions of Ordinance No. 185,573 to pay an in-lieu fee instead of providing a compliant number of on-site trees.

There are seven Mexican fan palms (*Washingtonia robusta*) street trees along Sunset Boulevard, which are not subject to the City's Protected Tree Ordinance but are subject to the City's street tree regulations, including the provisions of LAMC Section 62.169 that prohibit the removal, destruction, pruning, or injury to any street tree without first obtaining approval from the City's

⁴⁵ Pursuant to the Ordinance No. 186,873 and as defined in LAMC Section 17.02, a protected tree or shrub includes any of the following Southern California indigenous tree species, which measure 4 inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measure 4 inches or more in cumulative diameter, 4.5 feet above the ground level at the base of the shrub: Oak tree; Southern California Black Walnut tree; Western Sycamore tree; California Bay tree; Mexican Elderberry shrub; and Toyon shrub.

⁴⁶ Protected Tree Report, JTL Consultants, August 31, 2023.

⁴⁷ LAMC Section 46.01: "PROTECTED TREE OR SHRUB" means any of the following Southern California indigenous tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree, or any of the following Southern California indigenous shrub species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the shrub: Protected Trees: (a) Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*); (b) Southern California Black Walnut (*Juglans californica*); (c) Western Sycamore (*Platanus racemosa*); (d) California Bay (*Umeellularia californica*). Protected Shrubs: (a) Mexican Elderberry (*Sambucus mexicana*); (b) Toyon (*Heteromeles arbutifolia*). This definition shall not include any tree or shrub grown or held for sale by a licensed nursery, or trees or shrubs planted or grown as a part of a planting program.

⁴⁸ Plans, KTG Architecture and Planning, February 6, 2024.

Urban Forestry Division and/or the Board of Public Works. As described above, to ensure that the existing street trees will be protected during Project construction activities, **PDF-BIO-1** has been incorporated into the Project.

Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located on previously disturbed, developed land. The Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment. The Project Site contains limited to sparse landscaping in the form of non-native/non-protected trees, hedges, and shrubs.

As previously described, the Project Site does not support any known habitat or natural community.

There are no Habitat Conservation Plans near the Site.⁴⁹

There are no California Natural Community Conservation Plans (CNCCP) in the area. The only CNCCP in LA County is in the City of Rancho Palos Verdes.⁵⁰

Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.⁵¹

Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Cumulative Impacts

Less Than Significant Impact. Cumulative impacts associated with biological resources are generally a consequence of aggregate past, present, and foreseeable impacts of the Project and other projects located within the vicinity of the Project Site. There are nine potential Related Projects identified by the City of Los Angeles within 0.5 miles of the Project (see **Table 5.21-1** and **Figure 5.21-1**).⁵²

⁴⁹ USFWS, Habitat Conservation Plans: <https://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP>, accessed August 30, 2023.

⁵⁰ California Natural Community Conservation Plans, April 2019, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed August 30, 2023.

⁵¹ California Department of Fish and Wildlife, California Natural Community Conservation Plans, April 2019.

⁵² City of Los Angeles, Related Projects Summary from Case Logging and Tracking System, February 3, 2023 and internal team research.

Neither the Project Site nor any of the Related Projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur.

As discussed above, the Project Site does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and would not contribute related cumulative impacts. In addition, the Project and the Related Projects would comply with applicable regulatory requirements and mitigation measures regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City's regulations regarding protected trees and the removal of street trees. As such, no significant cumulative impacts regarding biological resources would occur.

Attachment B:

Smallwood Letter

Shawn Smallwood, PhD
3108 Finch Street
Davis, CA 95616

Richard Drury
Lozeau Drury LLP
1939 Harrison Street, Suite 150
Oakland, CA 94612

11 April 2024

RE: Sunset and Everett Project

Dear Mr. Drury,

I write to comment on a Sustainable Communities Environmental Assessment (SCEA) prepared by City of Los Angeles (2024) for a proposed project at Sunset Boulevard and Everett Street, where I understand 86- and 91-foot-tall buildings would include 327 residential units on 321,200 square feet of floor space, all on 2.5 acres.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and Raptor Research Foundation, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-seven years. My CV is attached.

SITE VISIT

On my behalf Noriko Smallwood, who is a wildlife biologist with a Master's Degree from California State University Los Angeles, visited the site of the proposed project for 2.82 hours from 06:45 to 109:34 hours on 7 April 2024. She walked the site's perimeter, stopping to scan for wildlife with use of binoculars. Noriko recorded all species of vertebrate wildlife she detected, including those whose members flew over the site or were seen nearby, off the site. Animals of uncertain species identity were either omitted or, if possible, recorded to the Genus or higher taxonomic level.

Conditions were partly cloudy with a slight north wind and 46° to 55° F. The site contained concrete pads of previous buildings, but was mostly overgrown with native and non-native shrubs, trees, and annual grass (Photos 1–3). These trees and shrubs and the overlying airspace of the project site support many species of vertebrate wildlife.



Photos 1–3. Views of the project site, 7 April 2024. Photos by Noriko Smallwood.

Noriko detected 30 species of vertebrate wildlife at or adjacent to the project site, including four species with special status (Table 1). Noriko saw Cooper’s hawk and red-tailed hawk (Photos 4 and 5), California gull (Photo 6), Allen’s hummingbird and hooded oriole (Photos 7 and 8), Cassin’s kingbird and California scrub-jay (Photos 9 and 10), house sparrow and California towhee (Photos 11 and 12), white-throated swift and barn swallow (Photos 13 and 14), lesser goldfinch (Photos 15 and 16), mourning dove and Eurasian collared-dove (Photos 17 and 18), house finch and northern mockingbird

(Photos 19 and 20), Canada goose (Photo 21), European starling (Photo 22), acorn woodpecker and common raven (Photo 23 and 24), California ground squirrel (Photo 25), among the other species listed in Table 1.

Signs of breeding on and near the site abounded. California towhee, house finch, and house sparrow were actively gathering nest material from the site for nests on and near the site. Lesser goldfinches were paired up and will likely nest on or near the site. Northern mockingbirds were very territorial and will likely nest on or near the site. An Allen's hummingbird displayed to another Allen's hummingbird and was very territorial, indicating they will likely nest on or near the site. Cassin's kingbirds chased each other indicating they will likely nest soon. Birds were very busy on site and the site has a large capacity to support nesting and foraging birds.

Noriko Smallwood certifies that the foregoing and following survey results are true and accurately reported.

Noriko Smallwood
Noriko Smallwood



Photos 4 and 5. Cooper's hawk soaring over the project site (left) and red-tailed hawk flying from one branch to another on the project site (right), 7 April 2024. Photos by Noriko Smallwood. Note the Cooper's hawk is looking down to search the site for prey items.



Photo 6. *California gulls flying over the project site, 7 April 2024. Photo by Noriko Smallwood.*



Photos 7 and 8. *Allen's hummingbird (left) and hooded oriole (right), on the project site, 7 April 2024. Photos by Noriko Smallwood.*



Photos 9 and 10. Cassin's kingbird on the project site (left), and California scrub-jay right next to the project site (right), 7 April 2024. Photos by Noriko Smallwood.



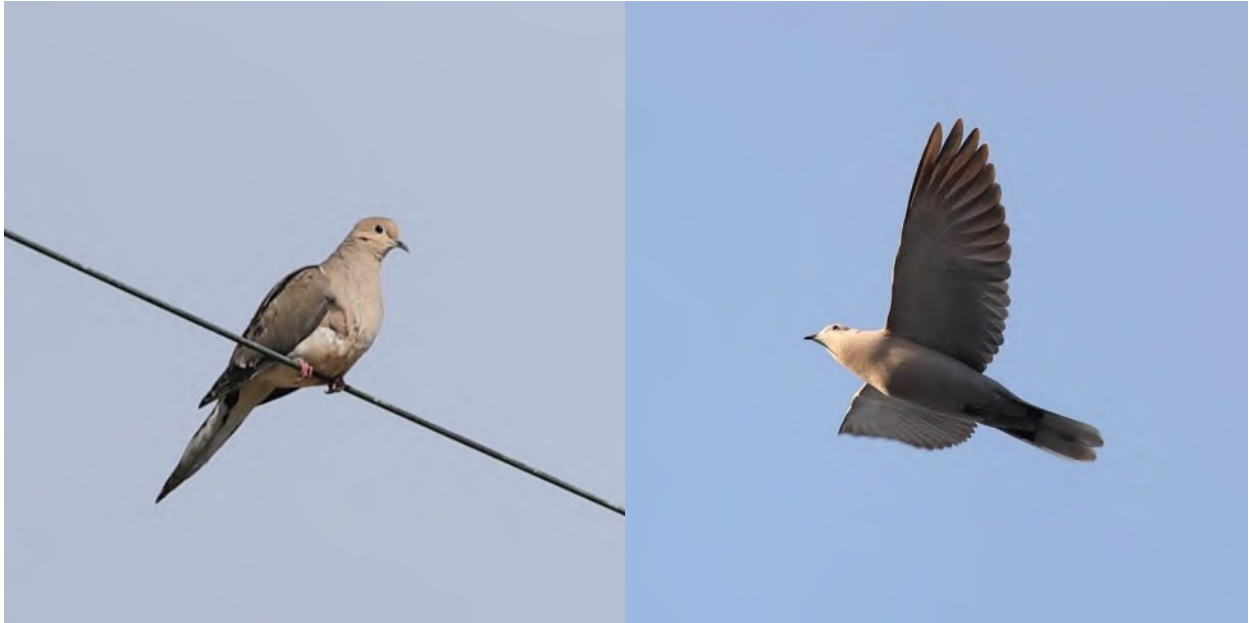
Photos 11 and 12. House sparrow with nest material (left) and California towhee (right), on the project site, 7 April 2024. Photos by Noriko Smallwood.



Photos 13 and 14. White-throated swifts (left) and barn swallow (right), on the project site, 7 April 2024. Photos by Noriko Smallwood.



Photos 15 and 16. Lesser goldfinch male (left) and female (right) foraging on plants on the project site, 7 April 2024. Photos by Noriko Smallwood.



Photos 17 and 18. Mourning dove (left) and Eurasian collared-dove (right), on the project site, 7 April 2024. Photos by Noriko Smallwood.



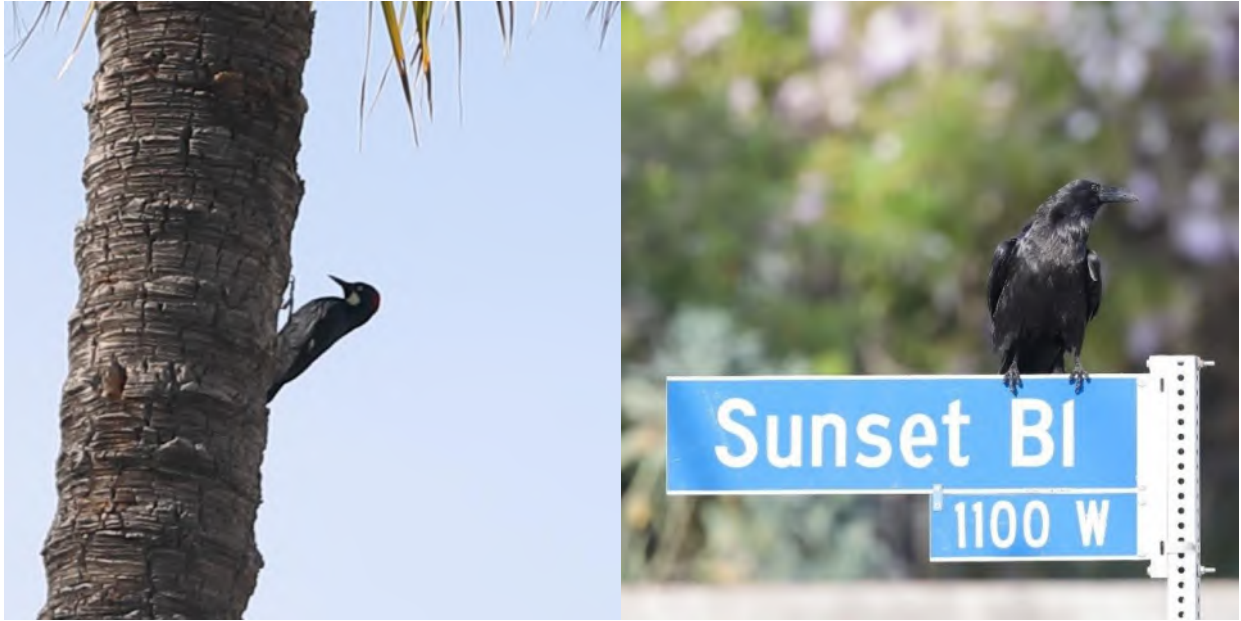
Photos 19 and 20. House finch (left) and northern mockingbird (right), on the project site, 7 April 2024. Photos by Noriko Smallwood.



Photo 21. *Canada goose flying over the project site, 7 April 2024. Photo by Noriko Smallwood.*



Photo 22. *European starling on the project site, 7 April 2024. Photo by Noriko Smallwood.*



Photos 23 and 24. Acorn woodpecker (left) and common raven (right), right next to the project site, 7 April 2024. Photos by Noriko Smallwood.



Photo 25. California ground squirrel on the project site, 7 April 2024. Photo by Noriko Smallwood.

Table 1. Species of wildlife Noriko observed during 2.82 hours of survey on 7 April 2024.

Common name	Species name	Status ¹	Notes
Canada goose	<i>Branta canadensis</i>		Two flew over
Rock pigeon	<i>Columba livia</i>	Non-native	Utilized site throughout survey
Eurasian collared-dove	<i>Streptopelia decaocto</i>	Non-native	Flew over
Mourning dove	<i>Zenaida macroura</i>		Perched
White-throated swift	<i>Aeronautes saxatalis</i>		Foraged over site
Anna's hummingbird	<i>Calypte anna</i>		Perched, territorial
Allen's hummingbird	<i>Selasphorus sasin</i>	BCC	Perched, territorial
California gull	<i>Larus californicus</i>	BCC, TWL	Flew over, calling
Cooper's hawk	<i>Accipiter cooperii</i>	TWL, BOP	Flew low over site then circled
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP	Perched on pole and trees on site, flew low over site
Acorn woodpecker	<i>Melanerpes formicivorus</i>		Next to site on palm tree
Cassin's kingbird	<i>Tyrannus vociferans</i>		Perched on palm trees, chased each other
Black phoebe	<i>Sayornis nigricans</i>		Perched on tree
California scrub-jay	<i>Aphelocoma californica</i>		Perched on tree next to site
American crow	<i>Corvus brachyrhynchos</i>		Perched, flew over, socialized
Common raven	<i>Corvus corax</i>		Perched, flew over, foraged
Barn swallow	<i>Hirundo rustica</i>		Flew over
Bushtit	<i>Psaltiriparus minimus</i>		Foraged in trees
House wren	<i>Troglodytes aedon</i>		Sang from trees
Northern mockingbird	<i>Mimus polyglottos</i>		Perched, sang, territorial
European starling	<i>Sturnus vulgaris</i>	Non-native	Perched, flew over
House sparrow	<i>Passer domesticus</i>	Non-native	Gathered nest material
House finch	<i>Haemorphous mexicanus</i>		Gathered nest material
Lesser goldfinch	<i>Spinus psaltria</i>		Foraged on plants
California towhee	<i>Melozone crissalis</i>		Gathered nest material
Hooded oriole	<i>Icterus cucullatus</i>		Perched on palm trees
House cat	<i>Felis catus</i>	Non-native	Near a house next to the site
Eastern fox squirrel	<i>Sciurus niger</i>	Non-native	On wires and trees
California ground squirrel	<i>Otospermophilus beecheyi</i>		One in dumpster with sticks
Botta's pocket gopher	<i>Thomomys bottae</i>		Burrows next to site

¹ Listed as BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, TWL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (California Fish and Game Code 3503.5).

Based on Noriko's survey findings, I am certain that at least four sensitive species of vertebrate wildlife occur at the project site. Making direct use of the trees and shrubs on the project site were special-status species including Allen's hummingbird and red-tailed hawk. The project site is habitat of these species.

California gull, Cooper's hawk, Allen's hummingbird, and red-tailed hawk made use of that portion of the aerosphere that the proposed buildings would displace. The aerosphere of the project site is habitat of these species.

Based on habitat associations, special-status species I expect to use the project site as habitat, but which have yet to be detected there, include monarch, rufous hummingbird, Costa's hummingbird, sharp-shinned hawk, red-shouldered hawk, Peregrine falcon, Nuttall's woodpecker, Bullock's oriole, western gull, Vaux swift, and at least several of the bat species in Table 2. The project site most likely is habitat of these special-status species, and of others in Table 2.

Considering Noriko's brief time at the project site, many species of wildlife were detected. The species Noriko detected included four special-status species, all of which are sensitive species whose presence obligates my determination that sensitive species occur on the project site. They do. Species listed by the US Fish and Wildlife Service as Birds of Conservation Concern and the Taxa to Watch List were prevalent on site, and species protected by California as Birds of Prey were utilizing the site as hunting grounds. Most of the birds in Table 1 are protected by the Migratory Bird Treaty Act and by the California Bird Protection Act, largely because birds are sensitive to disturbances to their nest attempts. The evidence is overwhelming that the project site provides habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, and fully protected species.

However, I must point out that the species of wildlife Noriko detected at the project site comprised only a sampling of the species that were present during her survey. I fit a nonlinear regression model to the cumulative number of vertebrate species detected with time into Noriko's 7 April 2024 survey to predict the number of species that she would have detected with a longer survey or perhaps with additional biologists available to assist. The model is a logistic growth model which reaches an asymptote that corresponds with the maximum number of vertebrate wildlife species that could have been detected during the survey. In this case, the model predicts many more species of vertebrate wildlife were available to be detected had Noriko's survey effort increased on the morning of 7 April 2024 (Figure 1). Unfortunately, I do not know the identities of the undetected species, but the pattern in Noriko's data indicates relatively high use of the project site compared to 10 surveys at other sites she and I have completed in southern California relatively near the coast. Compared to models fit to data we collected from other sites in the region between 2019 and 2023, the data from the project site follows along the upper bound of the 95% confidence interval of the rate of accumulated species detections with time into the survey (Figure 1). Importantly, however, the species that Noriko did and did not detect on 7 April 2024 composed only a fraction of the species that would occur at the project site over the period of a year or longer. This is because many species are seasonal in their occurrence.

Table 2. Occurrence likelihoods of special-status bird species at or near the proposed project site, according to eBird/iNaturalist records (<https://eBird.org>, <https://www.inaturalist.org>) and on-site survey findings, where ‘Very close’ indicates within 1.5 miles of the site, “nearby” indicates within 1.5 and 4 miles, and “in region” indicates within 4 and 30 miles, and ‘in range’ means the species’ geographic range overlaps the site. Entries in bold font identify species observed by Noriko.

Common name	Species name	Status¹	Databases, Site visit
Monarch	<i>Danaus plexippus</i>	FC	Very close
Crotch’s bumble bee	<i>Bombus crotchii</i>	CCE	Nearby
Blainville’s horned lizard	<i>Phrynosoma blainvillii</i>	SSC	In region
Coastal whiptail	<i>Aspidoscelis tigris stejnegeri</i>	SSC	In region
San Diegan legless lizard	<i>Anniella stebbinsi</i>	SSC	Nearby
Coast patch-nosed snake	<i>Salvadora hexalepis virgultea</i>	SSC	In region
Two-striped gartersnake	<i>Thamnophis hammondi</i>	SSC	In region
South coast gartersnake	<i>Thamnophis sirtalis pop. 1</i>	SSC	In range
Fulvous whistling-duck	<i>Dendrocygna bicolor</i>	SSC1	In region
Brant	<i>Branta bernicla</i>	SSC2	In region
Cackling goose (Aleutian)	<i>Branta hutchinsii leucopareia</i>	WL	Nearby
Redhead	<i>Aythya americana</i>	SSC2	Very close
Western grebe	<i>Aechmophorus occidentalis</i>	BCC	Very close
Clark’s grebe	<i>Aechmophorus clarkii</i>	BCC	Nearby
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT, CE, BCC	In region
Black swift	<i>Cypseloides niger</i>	SSC3, BCC	Nearby
Vaux’s swift	<i>Chaetura vauxi</i>	SSC2, BCC	Very close
Costa’s hummingbird	<i>Calypte costae</i>	BCC	Very close
Rufous hummingbird	<i>Selasphorus rufus</i>	BCC	Very close
Allen’s hummingbird	<i>Selasphorus sasin</i>	BCC	On site
Whimbrel ²	<i>Numenius phaeopus</i>	BCC	Nearby
Long-billed curlew	<i>Numenius americanus</i>	WL	In region
Marbled godwit	<i>Limosa fedoa</i>	BCC	In region
Short-billed dowitcher	<i>Limnodromus griseus</i>	BCC	In region
Willet	<i>Tringa semipalmata</i>	BCC	Nearby
American avocet ²	<i>Recurvirostra americana</i>	BCC	Nearby
Laughing gull	<i>Leucophaeus atricilla</i>	WL	In region
Heermann’s gull	<i>Larus heermanni</i>	BCC	In region
Western gull	<i>Larus occidentalis</i>	BCC	Very close
California gull	<i>Larus californicus</i>	BCC, WL	On site
California least tern	<i>Sternula antillarum browni</i>	FE, CE, FP	In region
Black tern	<i>Chlidonias niger</i>	SSC2, BCC	In region
Elegant tern	<i>Thalasseus elegans</i>	BCC, WL	Nearby
Common loon	<i>Gavia immer</i>	SSC	Nearby
Double-crested cormorant	<i>Phalacrocorax auritus</i>	WL	Very close
American white pelican	<i>Pelicanus erythrorhynchos</i>	SSC1, BCC	Very close
Least bittern	<i>Ixobrychus exilis</i>	SSC2	In region

Common name	Species name	Status¹	Databases, Site visit
White-faced ibis	<i>Plegadis chihi</i>	WL	Very close
Turkey vulture	<i>Cathartes aura</i>	BOP	Very close
Osprey	<i>Pandion haliaetus</i>	WL, BOP	Very close
White-tailed kite	<i>Elanus leucurus</i>	CFP, BOP	Very close
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA, CFP, BOP, WL	Very close
Northern harrier	<i>Circus cyaneus</i>	BCC, SSC3, BOP	Very close
Sharp-shinned hawk	<i>Accipiter striatus</i>	WL, BOP	Very close
Cooper's hawk	<i>Accipiter cooperii</i>	WL, BOP	On site
Bald eagle	<i>Haliaeetus leucocephalus</i>	CE, BGEPA, CFP	Very close
Red-shouldered hawk	<i>Buteo lineatus</i>	BOP	Very close
Swainson's hawk	<i>Buteo swainsoni</i>	CT, BOP	Very close
Red-tailed hawk	<i>Buteo jamaicensis</i>	BOP	On site
Ferruginous hawk	<i>Buteo regalis</i>	WL, BOP	Nearby
Zone-tailed hawk	<i>Buteo albonotatus</i>	BOP	Nearby
Harris' hawk	<i>Parabuteo unicinctus</i>	WL, BOP	In region
Barn owl	<i>Tyto alba</i>	BOP	Very close
Western screech-owl	<i>Megascops kennicotti</i>	BOP	Very close
Great horned owl	<i>Bubo virginianus</i>	BOP	Very close
Burrowing owl	<i>Athene cunicularia</i>	BCC, SSC2, BOP	Very close
Long-eared owl	<i>Asio otus</i>	BCC, SSC3, BOP	In region
Short-eared owl	<i>Asia flammeus</i>	BCC, SSC3, BOP	In region
Lewis's woodpecker	<i>Melanerpes lewis</i>	BCC	Very close
Nuttall's woodpecker	<i>Picoides nuttallii</i>	BCC	Very close
American kestrel	<i>Falco sparverius</i>	BOP	Very close
Merlin	<i>Falco columbarius</i>	WL, BOP	Very close
Peregrine falcon	<i>Falco peregrinus</i>	BOP	Very close
Prairie falcon	<i>Falco mexicanus</i>	WL, BOP	In region
Olive-sided flycatcher	<i>Contopus cooperi</i>	BCC, SSC2	Very close
Willow flycatcher	<i>Empidonax trailii</i>	CE	Very close
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	FE, CE	In region
Vermilion flycatcher	<i>Pyrocephalus rubinus</i>	SSC2	Nearby
Least Bell's vireo	<i>Vireo bellii pusillus</i>	FE, CE	Very close
Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC2	Very close
Oak titmouse	<i>Baeolophus inornatus</i>	BCC	Very close
California horned lark	<i>Eremophila alpestris actia</i>	WL	Nearby
Bank swallow	<i>Riparia riparia</i>	CT	Nearby
Purple martin	<i>Progne subis</i>	SSC2	Nearby
Wrentit	<i>Chamaea fasciata</i>	BCC	Very close
California gnatcatcher	<i>Polioptila c. californica</i>	FT, SSC2	In region
California thrasher	<i>Toxostoma redivivum</i>	BCC	Very close
Cassin's finch	<i>Haemorhous cassinii</i>	BCC	In region
Lawrence's goldfinch	<i>Spinus lawrencei</i>	BCC	Very close

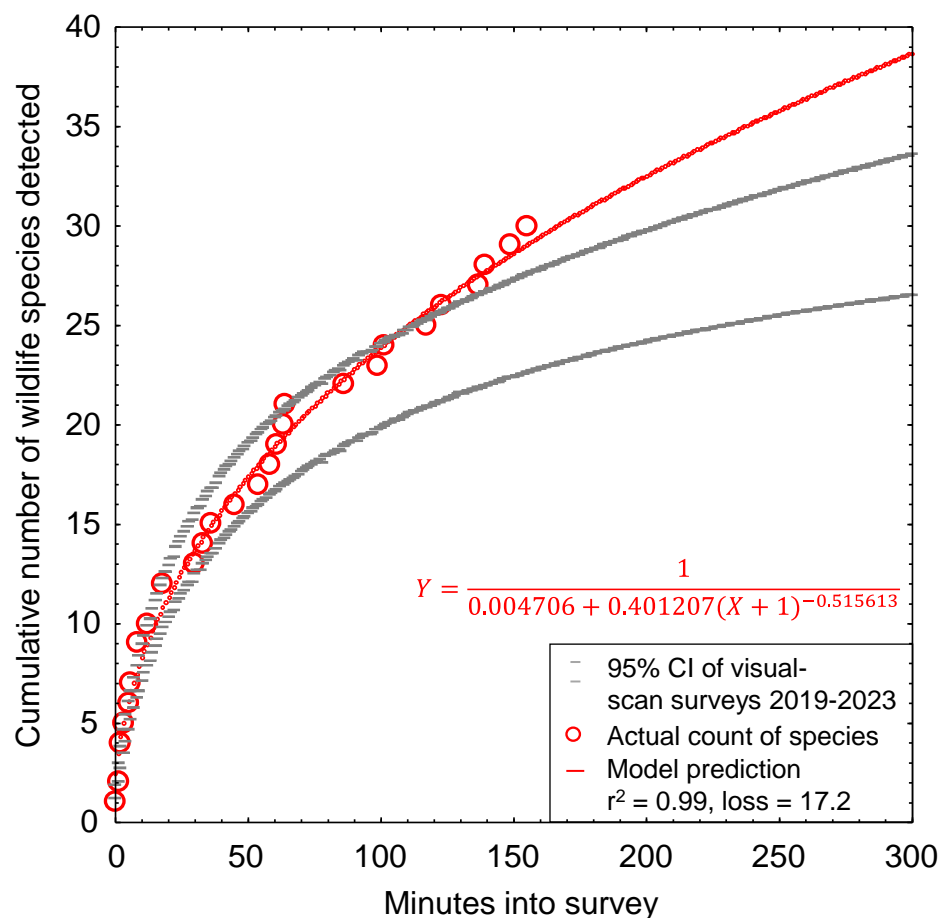
Common name	Species name	Status¹	Databases, Site visit
Grasshopper sparrow	<i>Ammodramus savannarum</i>	SSC2	Nearby
Black-chinned sparrow	<i>Spizella atrogularis</i>	BCC	In region
Gray-headed junco	<i>Junco hyemalis caniceps</i>	WL	Very close
Bell's sparrow	<i>Amphispiza b. belli</i>	WL	In region
Southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	WL	Very close
Yellow-breasted chat	<i>Icteria virens</i>	SSC3	Nearby
Yellow-headed blackbird	<i>X. xanthocephalus</i>	SSC3	Very close
Bullock's oriole	<i>Icterus bullockii</i>	BCC	Very close
Tricolored blackbird	<i>Agelaius tricolor</i>	CT, BCC, SSC1	Very close
Lucy's warbler	<i>Leiothlypis luciae</i>	SSC3, BCC	Very close
Virginia's warbler	<i>Leiothlypis virginiae</i>	WL, BCC	Very close
Yellow warbler	<i>Setophaga petechia</i>	SSC2	Very close
Summer tanager	<i>Piranga rubra</i>	SSC1	Very close
Pallid bat	<i>Antrozous pallidus</i>	SSC, WBWG:H	In range
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC, WBWG:H	In range
Silver-haired bat	<i>Lasionycteris noctivagans</i>	WBWG:M	Nearby
Spotted bat	<i>Euderma maculatum</i>	SSC, WBWG:H	In range
Hoary bat	<i>Lasiurus cinereus</i>	WBWG:M	Nearby
Western yellow bat	<i>Lasiurus xanthinus</i>	SSC, WBWG:H	In range
Western small-footed myotis	<i>Myotis cililabrum</i>	WBWG:M	In range
Miller's myotis	<i>Myotis evotis</i>	WBWG:M	In range
Little brown myotis	<i>Myotis lucifugus</i>	WBWG:M	In region
Fringed myotis	<i>Myotis thysanodes</i>	WBWG:H	In range
Long-legged myotis	<i>Myotis volans</i>	WBWG:H	In range
Yuma myotis	<i>Myotis yumanensis</i>	WBWG:LM	Nearby
Western mastiff bat	<i>Eumops perotis</i>	SSC, WBWG:H	Very close
Mexican free-tailed bat	<i>Tadarida brasiliensis</i>	WBWG:L	Very close
Los Angeles pocket mouse	<i>Perognathus longimembris brevinasus</i>	SSC	In range
Southern grasshopper mouse	<i>Onychomys torridus ramona</i>	SSC	In range

¹ Listed as FT or FE = federal threatened or endangered, FC = federal candidate for listing, BCC = U.S. Fish and Wildlife Service Bird of Conservation Concern, CT or CE = California threatened or endangered, CCT or CCE = Candidate California threatened or endangered, CFP = California Fully Protected (California Fish and Game Code 3511), SSC = California Species of Special Concern (not threatened with extinction, but rare, very restricted in range, declining throughout range, peripheral portion of species' range, associated with habitat that is declining in extent), SSC1, SSC2 and SSC3 = California Bird Species of Special Concern priorities 1, 2 and 3, respectively (Shuford and Gardali 2008), WL = Taxa to Watch List (Shuford and Gardali 2008), and BOP = Birds of Prey (CFG Code 3503.5), and WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H).

² Uncertain if BCC based on 2021 Bird of Conservation Concern list.

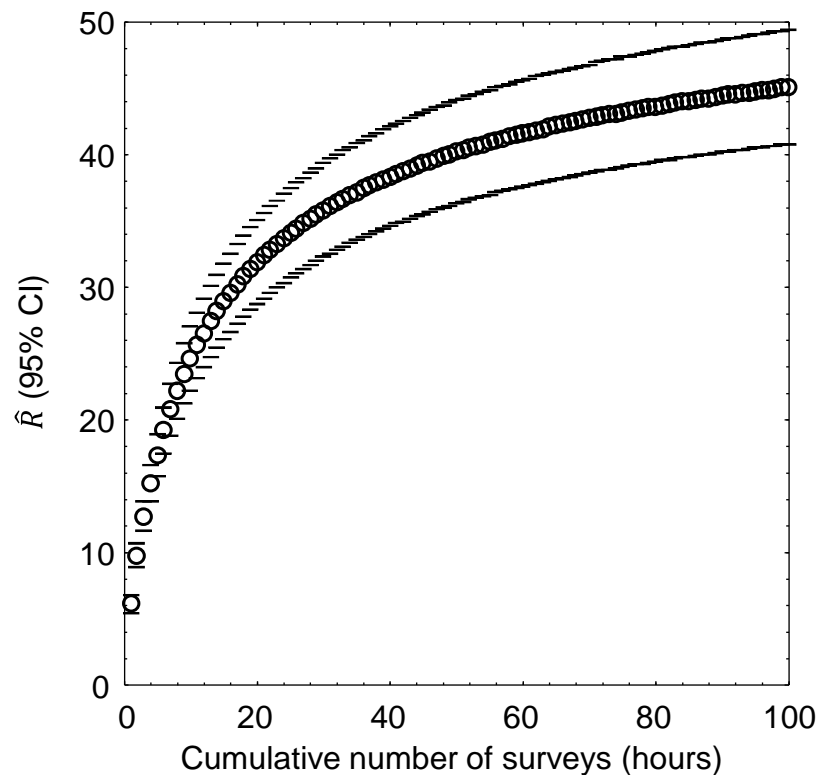
At least a year's worth of surveys would be needed to more accurately report the number of vertebrate species that occur at the project site, but I only have Noriko's one survey. However, by use of an analytical bridge, a modeling effort applied to a large, robust data set from a research site can predict the number of vertebrate wildlife species that likely make use of the site over the longer term. As part of my research, I completed a much larger survey effort across 167 km² of annual grasslands of the Altamont Pass Wind Resource Area, where from 2015 through 2019 I performed 721 1-hour visual-scan surveys, or 721 hours of surveys, at 46 stations. I used binoculars and otherwise the methods were the same as the methods I and other consulting biologists use for surveys at proposed project sites. At each of the 46 survey stations, I tallied new species detected with each sequential survey at that station, and then related the cumulative species detected to the hours (number of surveys, as each survey lasted 1 hour) used to accumulate my counts of species detected. I used combined quadratic and simplex methods of estimation in Statistica to estimate least-squares, best-fit nonlinear models of the number of cumulative species detected regressed on hours of survey (number of surveys) at the station: $\hat{R} = \frac{1}{1/a + b \times (\text{Hours})^c}$, where \hat{R} represented cumulative species richness detected. The coefficients of determination, r^2 , of the models ranged 0.88 to 1.00, with a mean of 0.97 (95% CI: 0.96, 0.98); or in other words, the models were excellent fits to the data.

Figure 1. Actual and predicted relationships between the number of vertebrate wildlife species detected and the elapsed survey time based on Noriko's visual-scan survey on 7 April 2024. Note that the relationship would differ if the survey was based on another method or during another season.



I projected the predictions of each model to thousands of hours to find predicted asymptotes of wildlife species richness. The mean model-predicted asymptote of species richness was 57 after 11,857 hours of visual-scan surveys among the 46 stations of my research site. I also averaged model predictions of species richness at each incremental increase of number of surveys, i.e., number of hours (Figure 2). On average I would have detected 12.2 species over my first 2.82 hours of surveys at my research site in the Altamont Pass (2.82 hours to match the 2.82 hours Noriko surveyed at the project site on 7 April 2024), which composed 37.2% of the predicted total number of species I would detect with a much larger survey effort at the research site. Given the example illustrated in Figure 2, the 30 species Noriko detected after 2.82 hours of survey at the project site on 7 April 2024 likely represented 37.2% of the species to be detected after many more visual-scan surveys over another year or longer. With many more repeat surveys through the year, Noriko would likely detect $30/0.372 = 81$ species of vertebrate wildlife at the site. Assuming Noriko's ratio of special-status to non-special-status species was to hold through the detections of all 81 predicted species, then continued surveys would eventually detect 11 special-status species of vertebrate wildlife.

Figure 2. Mean (95% CI) predicted wildlife species richness, \hat{R} , as a nonlinear function of hour-long survey increments across 46 visual-scan survey stations across the Altamont Pass Wind Resource Area, Alameda and Contra Costa Counties, 2015–2019. Note that the location of the study is largely irrelevant to the utility of the graph to the interpretation of survey outcomes at the project site. It is the pattern in the data that is relevant, because the pattern is typical of the pattern seen elsewhere.



Because my prediction of 81 species of vertebrate wildlife, including 11 special-status species of vertebrate wildlife, is derived from daytime visual-scan surveys, and would detect few nocturnal mammals such as bats, the true number of species composing the wildlife community of the site must be larger. Noriko's reconnaissance survey should serve only as a starting point toward characterization of the site's wildlife community, but it certainly cannot alone inform of the inventory of species that use the site. More surveys are needed than hers to inventory use of the project site by wildlife.

EXISTING ENVIRONMENTAL SETTING

The first step in analysis of potential project impacts to biological resources is to accurately characterize the existing environmental setting, including the biological species that use the site, their relative abundances, how they use the site, key ecological relationships, and known and ongoing threats to those species with special status. A reasonably accurate characterization of the environmental setting can provide the basis for determining whether the site holds habitat value to wildlife, as well as a baseline against which to analyze potential project impacts. For these reasons, characterization of the environmental setting, including the project site's regional setting, is one of CEQA's essential analytical steps. Methods to achieve this first step typically include (1) surveys of the site for biological resources, and (2) reviews of literature, databases and local experts for documented occurrences of special-status species. In the case of the proposed project, these needed steps were not completed.

Environmental Setting informed by Field Surveys

To CEQA's primary objective to disclose potential environmental impacts of a proposed project, the analysis should be informed of which biological species are known to occur at the proposed project site, which special-status species are likely to occur, as well as the limitations of the survey effort directed to the site. Analysts need this information to characterize the environmental setting as a basis for opining on, or predicting, potential project impacts to biological resources.

The City of Los Angeles did not have the project site surveyed for wildlife. The City simply assumed that wildlife are absent from the site. According to the City (page 5-55), "the Project Site is vacant (all previous uses and buildings have been removed) and situated within an urban environment, and therefore no known occupied habitat, potentially suitable habitat, or designated critical habitat exists on the Project Site or in the surrounding area." The conclusion fails to flow logically from the implied premise that patches of open space within an urban environment cannot support wildlife. The premise is false, and therefore so is the conclusion. Noriko's survey of the site utterly refutes the City's premise and its conclusion.

Environmental Setting informed by Desktop Review

The purpose of literature and database review and of consulting with local experts is to inform the field survey, and to augment interpretation of its outcome. Analysts need this information to identify which species are known to have occurred at or near the project site, and to identify which other special-status species could conceivably occur at the site due to geographic range overlap and migration flight paths.

The City of Los Angeles did not perform a desktop review, or at least the findings of a desktop review is not reported. No species occurrence database was consulted. No wildlife expert was consulted. This important CEQA step was skipped.

At page 5-66, the SCEA reports that the site is vacant and also covered in weeds and hundreds of invasive tree of heaven. However, the SCEA does not explain how the vegetation on the site prevents wildlife, and it does not.

In my assessment based on database reviews and site visits, 108 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential (Table 2). Of these 108 species, 4 (4%) were recorded on the project site, and another 46 (42%) species have been documented within 1.5 miles of the site ('Very close'), another 21 (20%) within 1.5 and 4 miles ('Nearby'), and another 26 (24%) within 4 to 30 miles ('In region'). Two thirds (66%) of the species in Table 2 have been reportedly seen within 4 miles of the project site. The site therefore supports multiple special-status species of wildlife and carries the potential for supporting many more special-status species of wildlife based on proximity of recorded occurrences.

At page 5-67, the SCEA reports "Due to the urbanized and disturbed nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in urbanized developed settings." However, had the City of Los Angeles had professional biologists survey the site, it would have seen that this statement is unsupportable. Noriko detected various species on the site, including red-tailed hawk, Cooper's hawk, California gull, white-throated swifts, acorn woodpecker and California ground squirrels – not the types of species normally found in residential backyards.

Regarding bats, the SCEA (page 5-68) states, "While none have been identified on the Project Site, it is possible that bats or bat roosts are present in on-site trees or in building cavities." However, City of Los Angeles did not have anyone search for bats on the project site. It is therefore misleading to state that no bats have been identified on the project site. Whereas it might be true that none have been identified, that none have been identified is meaningless if no surveys were conducted.

There is at least a fair argument to be made for the need to prepare an EIR to accurately characterize the existing environmental setting and to appropriately analyze the project impacts to wildlife from habitat fragmentation and from bird-glass collision mortality.

POTENTIAL BIOLOGICAL IMPACTS

An impacts analysis should consider whether and how a proposed project would affect members of a species, larger demographic units of the species, the whole of a species, and ecological communities. The accuracy of this analysis depends on an accurate characterization of the existing environmental setting. In the case of the proposed project, the existing environmental setting has not been accurately characterized, and several important types of potential project impacts have been inadequately analyzed. These types of impacts include habitat loss, interference with wildlife movement, and wildlife-automobile collision mortality.

HABITAT LOSS AND HABITAT FRAGMENTATION

City of Los Angeles (2024:4-21) claims that the 2020-2045 RTP/SCS strategy/measure to “Preserve, enhance, and restore regional wildlife connectivity “does not apply to the project site because it “does not serve as a regional wildlife connector...” However, the 30 species of vertebrate wildlife than Noriko detected within less than three hours indicate otherwise. All of the animals that Noriko saw at the site could not have been there had they not either traveled to the site from elsewhere or had their population not been sustained by other animals having earlier arrived to the site. The last remaining patches of open space and the residential yards and gardens maintained in trees and native plants enable wildlife to move across and to live within the greater Los Angeles megacity (Wood and Esaian 2020, Smallwood and Wood 2022).

The project site is one of the last remaining patches of open space in the region, as the region has undergone severe habitat fragmentation. Therefore, the habitat value of the site is especially high to species of wildlife that find breeding, refuge, and foraging opportunities there, as well as opportunities for stop-over during migration or dispersal across Los Angeles. The loss of the habitat on the project site would result in substantial reductions in species richness and the number of wild animals in the area (Smallwood and Smallwood 2023).

To measure the impacts of habitat loss to wildlife caused by development projects, Noriko Smallwood and I revisited 80 sites of proposed projects that we had originally surveyed in support of comments on CEQA review documents (Smallwood and Smallwood 2023). We revisited the sites to repeat the survey methods at the same time of year, the same start time in the day, and the same methods and survey duration in order to measure the effects of mitigated development on wildlife. We structured the experiment in a before-after, control-impact experimental design, as some of the sites had been developed since our initial survey and some had remained undeveloped. All of the developed sites had included mitigation measures to avoid, minimize or compensate for impacts to wildlife. Nevertheless, we found that mitigated development resulted in a 66% loss of species on site, and 48% loss of species in the project area. Counts of vertebrate animals declined 90%. “Development impacts measured by the mean number of species detected per survey were greatest for amphibians (-100%), followed by mammals (-86%), grassland birds (-75%), raptors (-53%), special-status species (-49%), all birds as a group (-48%), non-native birds (-44%), and synanthropic birds (-28%). Our results indicated that urban development substantially reduced vertebrate species richness and numerical abundance, even after richness and abundance had likely already been depleted by the cumulative effects of loss, fragmentation, and degradation of habitat in the urbanizing environment,” and despite all of the mitigation measures and existing policies and regulations. We also found that impacts to wildlife were most severe at infill project sites, where wildlife lacked habitat options on adjacent land areas.

Habitat loss not only results in the immediate numerical decline of wildlife, but it also results in permanent loss of productive capacity. Habitat fragmentation multiplies the negative effects of habitat loss on the productive capacities of biological species (Smallwood 2015). None of these impacts, however, are specifically addressed in the

SCEA. In the case of birds, two methods exist for estimating the loss of productive capacity that would be caused by the project. One method would involve surveys to count the number of bird nests and chicks produced. The alternative method is to infer productive capacity from estimates of total nest density elsewhere. Two study sites in grassland-wetland-woodland complexes had total bird nesting densities of 32.8 and 35.8 nests per acre (Young 1948, Yahner 1982). These densities, however, are probably too high for the project site, which lacks wetlands. Assuming the total nest density of the project site is half of the estimates reported by Young (1948) and Yahner (1982), then I predict 17 nest sites per acre. Assuming 1.39 broods per nest site based on Noriko's review of 322 North American bird species, which averaged 1.39 broods per year, then I predict the project supports 24 nest attempts/year. Assuming Young's (1948) study result 2.9 fledglings per year typifies productivity on the project site, then I predict 70 fledglings are produced annually on the project site. Assuming an average bird generation time of 5 years, the lost capacity of both breeders and annual fledgling production can be estimated from an equation in Smallwood (2022): $\{(nests/year \times chicks/nest \times number\ of\ years) + (2\ adults/nest \times nests/year) \times (number\ of\ years \div years/generation)\} \div (number\ of\ years) = 80\ birds\ per\ year\ denied\ to\ California.$

The impacts of habitat loss are not analyzed by City of Los Angeles (2024), because the City concluded without evidence that the site does not support wildlife. However, wildlife *do* occur on the site because the site provides habitat. It is my opinion that the impacts of habitat loss would be significant. A fair argument can be made for the need to prepare and EIR to appropriately analyze the impacts of habitat loss and to formulate appropriate mitigation measures.

INTERFERENCE WITH WILDLIFE MOVEMENT

One of CEQA's principal concerns regarding potential project impacts is whether a proposed project would interfere with wildlife movement in the region. Unfortunately, City of Los Angeles concludes without evidence that the site is unimportant to wildlife movement in the region. The City conducted no program of observation to characterize wildlife movement on or around the project site. The City did not have a wildlife survey performed in any fashion at all. No evidence has been made available in support of the City's conclusion, and the evidence Noriko collected refutes the City's conclusion.

The SCEA (page 5-71) claims that adherence to its mitigation requirements "would ensure that the Project would not interfere substantially with the movement of any native resident or migratory ... wildlife species..." However, the insertion of a long reach of 85-91-foot-tall glass-fronted buildings onto existing stopover and fly-through habitat would most certainly interfere with wildlife movement. Not only would the buildings present birds, bats and butterflies with substantial barriers to volant movement, but interior lighting would escape the large-panel windows, which would distract many avian nocturnal migrants, and which would increase bird collision risk. Depictions of the buildings appear to highlight the project's emissions of interior light (Figure 3). The project would interfere with wildlife movement while also introducing considerable bird-window collision risk.



Figure 3. One of the proposed buildings of the project, showing a lengthy barrier to bird flights, and abundant glass and interior lighting, both features of which increase bird-window collision risk. The image is from <https://la.urbanize.city/post/mixed-use-project-inches-forward-1185-w-sunset-boulevard-echo-park>.

BIRD-WINDOW COLLISIONS

The SCEA fails to consider impacts on wildlife from window collision. The project would add two seven-story buildings, 85 and 91 feet tall, totaling 321,300-square-feet of floor space. Based on the buildings' circumferences and heights and simulated depictions, I estimate the façades would be about 75% structural glass, not including all the glass railings. I estimate the project would add about 10,395 m² of glass, but again not including the railings.

Many special-status species of birds have been recorded at or near the aerosphere of the project site. My database review and Noriko's site visit indicates there are 83 special-status species of birds with potential to use the site's aerosphere (Table 2). All of the birds of species in Table 2 can quickly fly from wherever they have been documented to the project site, so they would all be within brief flights to the proposed project's windows.

Window collisions are often characterized as either the second or third largest source or human-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently by Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013)

estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. The proposed project would impose windows in the airspace normally used by birds.

Glass-façades of buildings intercept and kill many birds, but these façades are differentially hazardous to birds based on spatial extent, contiguity, orientation, and other factors. At Washington State University, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a three-story glass walkway (no fatality adjustments attempted). Prior to marking the windows to warn birds of the collision hazard, the collision rate was 84.7 per year. At that rate, and not attempting to adjust the fatality estimate for the proportion of fatalities not found, 4,574 birds were likely killed over the 54 years since the start of their study, and that's at a relatively small building façade. Accounting for the proportion of fatalities not found, the number of birds killed by this walkway over the last 54 years would have been about 14,270. And this is just for one 3-story, glass-sided walkway between two college campus buildings.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) incorporated many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only 2 of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source, their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

Buildings can intercept many nocturnal migrants as well as birds flying in daylight. As mentioned above, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted for undetected fatalities). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager et al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year, and at another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building façades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building façades. From 24 days of survey over a 48-day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities over 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities, thereby indicating a wide range in impacts likely influenced by various factors. There is ample evidence available to support my prediction that the proposed project would result in many collision fatalities of birds.

Project Impact Prediction

By the time of these comments, I had reviewed and processed results of bird collision monitoring at 213 buildings and façades for which bird collisions per m² of glass per year could be calculated and averaged (Johnson and Hudson 1976, O'Connell 2001, Somerlot 2003, Hager et al. 2008, Borden et al. 2010, Hager et al. 2013, Porter and Huang 2015, Parkins et al. 2015, Kahle et al. 2016, Ocampo-Peñuela et al. 2016, Sabo et al. 2016, Barton et al. 2017, Gomez-Moreno et al. 2018, Schneider et al. 2018, Loss et al.

2019, Brown et al. 2020, City of Portland Bureau of Environmental Services and Portland Audubon 2020, Riding et al. 2020). These study results averaged 0.073 bird deaths per m² of glass per year (95% CI: 0.042-0.102). This average and its 95% confidence interval provide a robust basis for predicting fatality rates at a proposed new project.

As noted above, I estimate the project would expose birds to 10,395 m² of glass. Given this much exposure, I predict annual bird deaths of 760 (95% CI: 451–10,069). The vast majority of these predicted deaths would be of birds protected under the Migratory Bird Treaty Act and under the California Migratory Bird Protection Act, thus causing significant unmitigated impacts. Given the predicted level of bird-window collision mortality, and the lack of any proposed mitigation, it is my opinion that the proposed project would result in significant adverse biological impacts, including the unmitigated take of both terrestrial and aerial habitat of birds and other sensitive species. There is at least a fair argument for the need to prepare an EIR to appropriately analyze the impact of bird-glass collisions that might be caused by the project.

CUMULATIVE IMPACTS

The SCEA presents a flawed cumulative impacts analysis. At page 5-73, it claims “Neither the Project Site nor any of the Related Projects are located on designated open space, conservation land, wildlife habitat, or riparian or wetland areas, and therefore no cumulative impacts associated with these designated areas would occur.” In fact, the project site is located on wildlife habitat. Noriko detected 30 species of vertebrate wildlife in less than three hours of survey. It is wildlife habitat.

The SCEA adds, “In addition, the Project and the Related Projects would comply with applicable regulatory requirements and mitigation measures regarding biological resources and protected species, including the Migratory Bird Treaty Act, California Fish and Game Code, and the City’s regulations regarding protected trees and the removal of street trees. As such, no significant cumulative impacts regarding biological resources would occur.” However, according to CEQA Guidelines §15064(h)(3), “a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.” And “When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project’s incremental contribution to the cumulative effect is not cumulatively considerable.” The SCEA provides no explanation of how implementing the regulations would minimize, avoid or offset the project’s contributions to cumulative impacts. Furthermore, if compliance with existing regulations truly prevented cumulative impacts, then Smallwood and Smallwood (2023) would not have found large declines in species richness and wildlife abundance among project sites where development proceeded where the same regulations apply.

INADEQUATE MITIGATION

PMM BIO-1: Mitigation measures that can and should be implemented to reduce substantial adverse effects related to threatened and endangered species. This measure includes a list of what appears to be aspirational measures, most of which the City of Los Angeles (2024) asserts do not apply to the project.

Because wildlife occur on the project site, including special-status species, consistency with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines requires that:

- a) Project design avoids occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible.
- d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species.
- e) A Worker Environmental Awareness Program should be developed and implemented (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources.
- f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation.
- g) A qualified biologist be appointed to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.
- h) A qualified biologist be appointed to monitor implementation of mitigation measures.
- i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.
- l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance.
- m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.

PMM BIO-4: Wildlife Movement

Because wildlife occur on the project site, including special-status species, consistency with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines requires that:

- d) A survey be conducted to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31.
- e) Construction activities be prohibited within 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season.
- f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season.
- h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on and off-site.
- j) Review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation.

Because the City of Los Angeles has decided not to implement most of the above measures, the SCEA is not consistent with the Sustainable Communities Strategy. The project's impacts to wildlife would be inadequately mitigated. A fair argument can be made for the need to prepare and EIR to appropriately formulate mitigation measures.

PROPOSED MEASURES

MM-BIO-1: *The Project Applicant/contractor would conduct all demolition, construction, ground disturbance, and vegetation clearing activities, including removal of the existing trees, outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible. ... If removal of the existing trees on and adjacent to the Project Site must occur during the nesting season, a qualified biologist is required to be present during the removal activities to ensure no active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest) are impacted. The biologist must determine whether active nests are present within the trees before any actual removal activity takes place. ... If any active nests are present within the trees during demolition, construction, ground disturbance, and vegetation clearing activities, the nests shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for any active nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.*

The SCEA misrepresents the avian breeding season; it is now recognized by the CDFW as 1 February through 15 September.

I concur with the implementation of preconstruction surveys for nesting birds, but it should be understood that preconstruction surveys are no substitute for detection surveys. It should be understood that preconstruction surveys, although warranted, actually achieve very little because most nesting birds are very difficult to locate. Preconstruction, take-avoidance surveys consist of two steps, both of which are very difficult. First, the biologist(s) performing the survey must identify birds that are breeding. Second, the biologist(s) must locate the breeding birds' nests. The first step is typically completed by observing bird behaviors such as food deliveries and nest territory defense. These types of observations typically require many surveys on many dates spread throughout the breeding season.

Finally, the mitigation language allows a single individual to make a subjective decision, outside the public's view, to determine the buffer area for any given species. This measure lacks objective criteria, and is unenforceable.

RTP/SCS Mitigation Measures

PMM BIO-1(g): *Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact.*

This measure is proposed to mitigate impacts to bats. However, the measure lacks specificity to bats, would likely be implemented at the wrong time of day (not at night), and would be implemented too late to avoid impacts to bats. To be effective, a detection survey for bats needs to be completed long before construction monitoring.

PMM BIO-1(i): *Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased.*

This measure is inconsistent with MM-BIO-1, because MM-BIO-1 allows for construction to commence during the avian breeding season. For these measures to be consistent, MM-BIO-1 needs to be revised to very clearly prohibit construction during the avian breeding season.

RECOMMENDED MEASURES

Guidelines on Building Design to Minimize Bird-Window Collisions: If the Project goes forward, it should adhere to available Bird-Safe Guidelines, such as those prepared by American Bird Conservancy and New York and San Francisco. The American Bird Conservancy (ABC) produced an excellent set of guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties

to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015). The City of San Francisco (San Francisco Planning Department 2011) also has a set of building design guidelines, based on the excellent guidelines produced by the New York City Audubon Society (Orff et al. 2007). The ABC document and both the New York and San Francisco documents provide excellent alerting of potential bird-collision hazards as well as many visual examples.

New research results inform of the efficacy of marking windows. Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 69% after placing decals on windows. In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film. At the building with fritted glass, bird collisions were 82% lower than at other buildings with untreated windows. Kahle et al. (2016) added external window shades to some windowed façades to reduce fatalities 82% and 95%. Brown et al. (2020) reported an 84% lower collision probability among fritted glass windows and windows treated with ORNILUX R UV. City of Portland Bureau of Environmental Services and Portland Audubon (2020) reduced bird collision fatalities 94% by affixing marked Solyx window film to existing glass panels of Portland’s Columbia Building. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015). For example, Feather Friendly® circular adhesive markers applied in a grid pattern across all windows reduced bird-window collision mortality by 95% in one study (Riggs et al. 2023) and by 95% in another (de Groot et al. 2021). Another study tested the efficacy of two filmshades to be applied exteriorly to windows prior to installations: BirdShades increased bird-window avoidance by 47% and Haverkamp increased avoidance by 39% (Swaddle et al. 2023).

Monitoring and the use of compensatory mitigation should be incorporated at any new building project because the measures recommended in the available guidelines remain of uncertain efficacy, and even if these measures are effective, they will not reduce collision fatalities to zero. The only way to assess mitigation efficacy and to quantify post-construction fatalities is to monitor newly constructed buildings or homes for fatalities.

Fund Wildlife Rehabilitation Facilities: Compensatory mitigation ought also to include funding contributions to wildlife rehabilitation facilities to cover the costs of injured animals that will be delivered to these facilities for care. Many animals would likely be injured by collisions with automobiles and windows and by depredation attempts by house cats and dogs.

Thank you for your attention,



Shawn Smallwood, Ph.D.

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Attachment C:

Protected Tree Arborist Report

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TABLE OF CONTENTS

Summary	1
Introduction	1
Background	1
Assignment	2
Limits of Assignment	2
Purpose and Use of the Report.....	2
Observations	2
Site Description	2
Tree Descriptions	3
Discussion	3
Mechanical Damage	3
Change in Grade	4
Trenching	4
Soil Compaction	4
Conclusion	4
Recommendations	5
Glossary	5
Bibliography	6
Appendix A – Tree Location Map.....	7
Appendix B – Photos	8
Appendix C – Assumptions and Limiting Conditions	9
Appendix D – Certificate of Performance.....	10
Appendix E – Qualifications	11
Site Plan	Attachment

Summary

Aragon Properties plans to develop a vacant lot at 1185 Sunset Boulevard in Los Angeles by constructing two seven-story, 327-unit mixed-use commercial and residential buildings, which will include 41 very-low-income residential units and 9,462 square feet of commercial space. The project is seeking an entitlement request as part of the City of Los Angeles Planning Department's **Density Bonus**¹ incentive program for a Floor Area Ratio increase and a building height increase. There are seven street trees on the project site which are protected by Los Angeles Municipal Code **Chapter VI, Article 2, Section 62.161**. The City of Los Angeles Preservation of Protected Trees Ordinance 186,873 requires a Protected Tree Report be submitted outlining how the **Protected Trees** will be protected during the development project. No protected street trees will be removed for this project.

JTL Consultants conducted an inspection of the project site on August 16, 2023 and inventoried seven Mexican fan palms (*Washingtonia robusta*) on Sunset Boulevard. There are no Protected Tree and Shrub species, listed in the Preservation of Protected Trees Ordinance 186,873, on the project site.

The seven Mexican fan palms will be protected during the development project by installing tree protection fencing around the trees. The project arborist will be on-site when the tree protection fencing is installed and if any work takes place within the fenced enclosures.

Introduction

Background

Aragon proposes to build two seven-story, mixed-use commercial and residential buildings on a vacant lot at 1185 Sunset Boulevard Los Angeles, CA 90026. The buildings will have 327 residential units, 41 of which will be used for very low-income households. There will be approximately 9,462 square feet of ground-floor commercial space. The lot is 107,170 square feet and the proposed buildings will have a total floor area of 321,300 square feet. The City of Los Angeles Planning Department's Density Bonus is a local incentive program designed to encourage the production of on-site affordable housing. Density Bonus Project Entitlement Requests include an On-Menu Incentive for the increase in the floor area ratio and an Off-Menu Incentive for an increase in the maximum building height. There are seven Mexican fan palm street trees on the property that are protected by Los Angeles Municipal Code, Section 62.162. Los Angeles Ordinance 186,873 requires a Protected Tree Report be submitted describing how the seven street trees will be protected during construction. Jeff Farrington from Aragon Properties requested JTL Consultants write a Protected Tree Report for this project and JTL Consultants inventoried the trees on August 16, 2023.

¹ Terms appearing in boldface type are defined in the Glossary

Assignment

JTL Consultants' assignment was to identify all Protected Trees on the project site and write a Protected Tree Report outlining how the Protected Trees will be protected during construction. This report will comply with the City of Los Angeles Protected Tree Ordinance 186,873.

Limits of Assignment

This report is based solely on a visual inspection of the site and trees on August 16, 2023 and a review of the project plans provided by Aragon Properties. The tree inspections were limited to ground level visual observations. Root crown inspections, aerial inspections, Tree Risk Assessments, and Tree Appraisals were not included in this assignment.

Purpose and Use of the Report

The purpose of this report is to identify the Protected Trees on the project site and outline how the trees will be protected during the construction project. This report is intended to be used by Aragon Properties to implement the recommendations outlined in it. Upon submission, this report will become the property of Aragon Properties and its use will be at their discretion.

Observations

Site Description

The project site is located at 7979 Sunset Boulevard on the corner of Everett Street, in the Silver Lake-Echo Park-Elysian Valley Community Plan area of the City of Los Angeles, in the County of Los Angeles. The site is southwest of Dodger Stadium, northwest of the 110 Freeway, northeast of the 101 Freeway, and southeast of Echo Park. Griffith Park, the Griffith Observatory, the Greek Theatre, and the Hollywood Bowl are northwest of the project site. There are mixed commercial and retail businesses along Sunset Boulevard. The surrounding neighborhoods are comprised of single-family residences and apartment buildings. The project site is a vacant lot covered with several hundred tree-of-heaven trees (*Ailanthus altissima*) and various weeds. There are seven Mexican fan palm street trees in sidewalk openings on Sunset Boulevard. There are no Protected Tree and Shrub species listed in the Preservation of Protected Trees Ordinance 186,873 on the project site. (Appendix A – Tree Location Map, Appendix B – Photos, and Attachment – Site Plan)

Tree Descriptions

In the following table, the tree numbers correspond to an aluminum number tag attached to the trunk of each tree and referenced on the Tree Location Map, Photos, and Site Plan. The photo letters correspond to those shown in Photos. The trees are street trees, non-native, and intentional ornamental plants. All trees will be preserved.

	Tree #	Scientific Name Common Name	Photo	Size	Cond.	Comments
1	721	<i>Washingtonia robusta</i> Mexican fan palm	A	DBH: 20" Hght: 100' Wt.: 10'	Fair	Curved trunk. Mechanical damage. Graffiti on trunk.
2	722	<i>Washingtonia robusta</i> Mexican fan palm	A	DBH: 19" Hght: 100' Wt.: 10'	Fair	Graffiti on trunk. Adventitious roots.
3	723	<i>Washingtonia robusta</i> Mexican fan palm	B	DBH: 19" Hght: 100' Wt.: 10'	Fair	Curved trunk. Mechanical damage. Graffiti on trunk.
4	724	<i>Washingtonia robusta</i> Mexican fan palm	B	DBH: 18" Hght: 100' Wt.: 10'	Fair	Curved trunk. Graffiti on trunk. Adventitious roots.
5	725	<i>Washingtonia robusta</i> Mexican fan palm	B	DBH: 19" Hght: 100' Wt.: 10'	Fair	Curved trunk. Graffiti on trunk. Cavity in lower trunk.
6	726	<i>Washingtonia robusta</i> Mexican fan palm	C	DBH: 19" Hght: 100' Wt.: 10'	Fair	Curved trunk. Graffiti on trunk. Small palm growing at base of tree.
7	727	<i>Washingtonia robusta</i> Mexican fan palm	C	DBH: 20" Hght: 100' Wt.: 10'	Fair	Curved trunk. Mechanical damage. Hourglass trunk width.

Discussion

Mechanical Damage

Additional mechanical damage to the Mexican fan palm street trees could occur during the construction.

Wounds to tree branches and trunks caused by mechanical damage may reduce tree stability by decreasing the wood strength, the internal movement of water and nutrients, and the ability to defend against decay. Protecting the trees with fencing will help prevent damage from construction. (Matheny, et al, 1998 and Fite, Kelby, and Smiley, 2008)

Change in Grade

The grade will not be lowered or raised within the **dripline** of the Mexican fan palm street trees during construction.

The lowering or raising of the grade within the dripline can damage or kill a tree. The normal exchange of moisture and gases within the dripline is disrupted with the change in grade. The original grade should be maintained as far out from the trunk as possible. The change in grade can have immediate or long-term adverse effects on the tree. (Matheny and Clark, 1998)

Trenching

Trenching within the dripline of the Mexican fan palm street trees will not occur during construction.

Trenching within the dripline can damage the root system of a tree and lead to tree decline or death. Ninety percent of the fine roots that absorb water and minerals are found in the upper few inches of soil. Roots require space, air, and water, and grow best where these requirements are met, which is usually at or near the soil surface. When roots are cut due to trenching, the cut should be clean, leaving no torn edges. Tunneling and bridging should be used to preserve roots wherever possible, underground lines should occupy common trenches. (Matheny, et al, 1998)

Soil Compaction

Soil compaction could occur within the dripline of the two Mexican fan palm street trees during construction.

Soil compaction occurs when the pore space between soil particles is greatly reduced. This causes the reduction of oxygen available to the roots and can lead to decline in trees. Use of equipment, grading, digging, and heavily used walking paths can cause soil compaction in a construction area. Use of protective fencing, mulching within the protective fencing, and limiting the amount of access routes will minimize soil compaction. (Fite, et al, 2008)

Conclusion

Aragon Properties plans to build two seven-story, 327-unit mixed-use commercial and residential buildings on a vacant lot at 1185 Sunset Boulevard which will include 41 very-low-income residential units and 9,462 square feet of commercial space. Jeff Farrington from Aragon Properties contacted JTL Consultants to write a Protected Tree Report for this project. JTL Consultants inventoried seven street trees at the project site on August 16, 2023. The street trees are protected by the Los Angeles Municipal Code, Section 62.162. No trees are proposed to be removed. There are no Protected Tree and Shrub species listed in the Preservation of Protected Trees Ordinance 186,873 on the project site. The recommendations will be followed to minimize the impacts of the construction activities on the street trees.

Recommendations

1. Install tree protection fencing around the street trees at locations shown on the Site Plan.
 - a. Chain-link fencing will be at least five-feet tall. This fencing will remain in place through the duration of the construction. Orange flexible fencing will not be used.
 - b. The fencing will not be moved at any time for construction work unless the work is supervised by the project arborist.
 - c. Within the fenced enclosures, no digging, trenching, soil compaction, or other soil disturbance will be allowed, and the fenced enclosures will be kept clear of building materials, waste, and excess soil.
2. Remove small palm from the base of Tree 726.
3. For aesthetics, the developer may want to consider removing graffiti from palm trunks.
4. The project arborist will be on-site when the tree protection fencing is installed and if any excavation, drilling, demolition, or backfilling takes place within the fenced enclosures of the three street trees. The project arborist will also make periodic site visits to ensure the tree protection fencing is in place and to monitor the condition of the trees.

Glossary

Adventitious Roots: fibrous primary roots that grow independently and periodically from the tree roots.

Condition: one of four possible ratings:

Good - no apparent **defects** or structural problems

Fair - minor defects or structural problems

Poor - major defects or structural problems

Dead - extreme defects or structural problems

DBH: diameter of a tree trunk measured at 4 ½ feet above ground.

Defect: an internal or external point of weakness which can reduce the stability of the tree and include cracks, splits, cankers, galls, girdling, codominant limbs, and wounds.

Density Bonus: a Los Angeles City Planning local incentive program designed to encourage the production of on-site affordable housing in neighborhoods where multi-family zoning is allowed. Along with the City's Transit Oriented Communities Incentive Program, the Density Bonus Program is Los Angeles's biggest driver in producing mixed-income and 100% affordable housing.

Qualifying Density Bonus projects can select from a number of pre-vetted "on-menu" incentives or request the approval of "off-menu" waivers of development standards, in addition to a density increase of up to 35% and a reduction in parking requirements. These incentives apply to projects that seek a limited increase in allowed height, floor area, and lot coverage, along with reductions to yard/setback, open space, and lot width requirements. Developers can request off-menu incentives and waivers of development standards beyond the incentives of State Density Bonus Law.

Dripline: imaginary line defined by the branch spread of a single plant or group of plants, projected onto the ground. Roots are usually found within the dripline but can extend beyond the edge of the dripline.

Los Angeles Municipal Code Chapter VI, Article 2, Section 62.161

Chapter VI, Public Safety and Protection

Article 2, Streets and Sidewalks

Section 62.161, Planting, Maintenance, and Care of Plants in City Streets -Jurisdiction of the Board

The Board of Public Works, through its authorized officers and employees, shall exercise jurisdiction and control over the planting, maintenance and care of trees, plants, and shrubs in all streets of the City.

Protected Tree

The City of Los Angeles Preservation of Protected Trees, Ordinance 186,873, Section 46.01 defines a Protected Tree or Shrub as any tree or shrub within the City of Los Angeles that one of the following southern California native species, which measure four inches or more in cumulative diameter, four and one-half feet above ground:

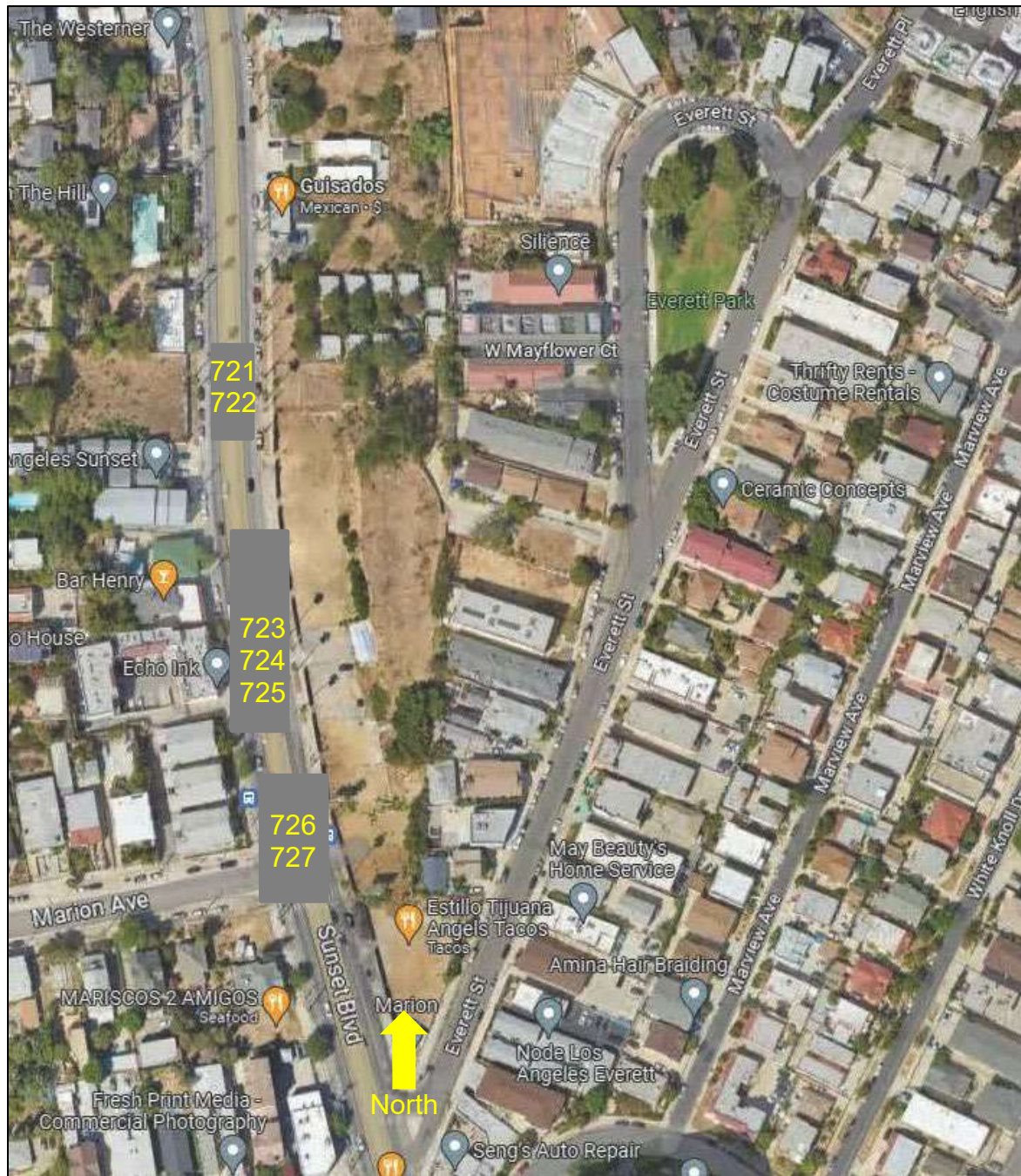
- Any Oak tree including Valley Oak (*Quercus lobata*) and California Live Oak (*Quercus agrifolia*), or any other tree of the oak genus indigenous to California but excluding the Scrub Oak (*Quercus berberidifolia*)
- Southern California Black Walnut (*Juglans californica* var. *californica*)
- Western Sycamore (*Platanus racemosa*)
- California Bay (*Umbellularia californica*)
- Mexican Elderberry (*Sambucus mexicana*)
- Toyon (*Heteromeles arbutifolia*)

Bibliography

Fite, Kelby, and Smiley, Thomas E., Best Management Practices, *Managing Trees During Construction*, International Society of Arboriculture, Champaign, IL 2008.

Matheny, Nelda and Clark, James R., *Trees and Development: A Technical Guide to Preservation of Trees during Land Development*, International Society of Arboriculture, Champaign, IL 1998.

Appendix A – Tree Location Map



Appendix B – Photos



All trees are Mexican fan palms (*Washingtonia robusta*) and are protected street trees.

Photo A, facing southeast, showing Trees 721 and 722 at the northern end of the property.

Photo B, facing southeast, showing Trees 723, 724, and 725 in the middle of the property.

Photo C, facing southeast showing Tree 726 on the northeast corner of Sunset Boulevard and Marion Avenue, and Tree 727 on the southeast corner of Sunset Boulevard and Marion Avenue.

Appendix C - Assumptions and Limiting Conditions

1. Any legal description provided to the consultant/appraiser is assumed to be correct. Any titles and ownerships to any property are assumed to be good and marketable.
2. Care has been taken to obtain all information from reliable sources. All data has been verified insofar as possible for the accuracy of information provided by others.
3. The consultant/appraiser shall not be required to give testimony or attend court by reason of this report unless subsequent contractual arrangements are made, including payment of an additional fee for such services as described in the fee schedule and contract of engagement.
4. Loss or alteration of any part of this report invalidates the entire report.
5. Possession of this report or a copy thereof does not imply right of publication or use for any purpose by any other than the person to whom it is addressed, without the prior expressed written consent of the consultant/appraiser.
6. This report and values expressed herein represent the opinion of the consultant/appraiser, and the consultant's/appraiser's fee is in no way contingent upon the reporting of a specified value, a stipulated result, the occurrence of a subsequent event, nor upon any finding to be reported.
7. Sketches, diagrams, graphs, and photographs in this report, being intended as visual aids, are not necessarily to scale and should not be construed as engineering or architectural reports or surveys.
8. The tree locations in this report are not represented to be of survey quality but are sufficient to allow locating the tree in the field.
9. Unless expressed otherwise: 1) information contained in this report covers only those items that were examined and reflects the condition of those items at the time of inspection; and 2) the inspection is limited to visual examination of accessible items without dissection, excavation, probing, or coring. There is no warranty or guarantee, expressed or implied, that problems or deficiencies of the trees or property in question may not arise in the future.
10. Unless specifically stated, Tree Risk Assessments were not conducted on the trees described in this report and JTL Consultants is not responsible for the consequences of any risk associated with the trees, either inferred or implied.

Appendix D - Certificate of Performance

I, Ted Lubeshkoff, certify:

- ✓ That I have personally inspected the tree(s) referred to in the report and have stated my findings accurately. The extent of the evaluation is stated in the attached report;
- ✓ That I have no current or prospective interest in the vegetation or the property that is the subject of this report and have no personal interest or bias with respect to the parties involved;
- ✓ That the analysis, opinions and conclusions stated herein are my own and are based on current scientific procedures and facts;
- ✓ That my analysis, opinions and conclusions were developed, and this report has been prepared according to commonly accepted arboriculture practices;
- ✓ That no one provided significant professional assistance to me, except as indicated within the report;
- ✓ That my compensation is not contingent upon the reporting of a predetermined conclusion that favors the cause of the client or any other party nor upon the results of the assignment, the attainment of stipulated results, or the occurrence of any subsequent events.

I further certify that I, Ted Lubeshkoff, am Registered Consulting Arborist #513 with the American Society of Consulting Arborists, and Certified Arborist WE-8446A with the International Society of Arboriculture. I have been involved in the practice of arboriculture and the care and study of trees for over 25 years.

Signed



Date: 8/31/2023

Appendix E - Qualifications

TED LUBESHKOFF

Registered Consulting Arborist and Principal

JTL Consultants

(626) 358-5690 | Ted@JTLconsultants.com | JTLconsultants.com

Ted Lubeshkoff is a Registered Consulting Arborist, a Certified Arborist, Tree Risk Assessment Qualified. He has worked on public utility projects with various companies including Southern California Edison, Pacific Gas and Electric, Southern California Gas Company, California American Water, and Los Angeles Metropolitan Transit Authority.

EDUCATION

Utah State University – Logan, UT College of Natural Resources, 1981-1985

University of La Verne – La Verne, CA – Bachelor of Arts Natural History, 1988

CERTIFICATIONS

- Registered Consulting Arborist #513, American Society of Consulting Arborists
- Certified Arborist WE-8446A, International Society of Arboriculture
- Qualified Tree Risk Assessor, International Society of Arboriculture

PROFESSIONAL SERVICE

- American Society of Consulting Arborists – American Forests “Ask an Arborist”
- International Society of Arboriculture – Proctor for Certified Arborist Exam
- Western Chapter of ISA – Co-chair Consulting Arborist Committee
- Street Tree Seminars – Executive Board Director

PROFESSIONAL OUTREACH

City of Duarte Arbor Day Tree Planting, October 12, 2019

Instructed and oversaw the planting of trees in Royal Oaks Park by volunteers.

PRESENTATIONS AND PUBLICATIONS

Facilitated Roundtable Discussion on *The Business Side of Consulting*, February 23, 2023.

Article: *Codes of Ethics and Standards of Professional Practice*. Western Arborist. Fall 2021.

City of Duarte Tree Care Workshop, September 7, 2019

Discussed soil information, photosynthesis, tree species identification and diversity, proper tree planting, irrigation techniques, proper tree placement, tree diseases.

Western Tree Failure Database Conference, March 28, 2019

Discussed the failure of an Italian Stone Pine (*Pinus pinea*) at the Kidspace Museum in Pasadena, California on July 28, 2015

Example Reports for Consulting Arborists, 3rd Edition, American Society of Consulting Arborists, 2013, 9707 Key West Avenue, Suite 100, Rockville, MD 20850

NOTABLE PROJECTS

LA Metro G-Line Bike Path Tree Damage Assessments June 2023

Assessed 90 trees causing damage to the bike path, mapped the trees using ArcGIS software, and wrote a Tree Assessment Report making recommendations to repair the asphalt damage, while preserving the majority of the trees.

Annual Inspection of a Historic Valley Oak, City of Westlake Village, April 2023

Inspected the Aspenview Court valley oak to determine if there were dead branches in the canopy and decay in the root crown and to make pruning recommendations.

LA Metro G-Line Busway Rapid Transit Improvements Project, March 2023

Assessed 13 trees within the busway that could be impacted by 42 utility potholing locations, mapped the trees and boring locations using ArcGIS software, and wrote a Tree Assessment Report making recommendations to protect the trees during the potholing.

LA Metro G-Line Busway Rapid Transit Improvements Project, January 2023

Evaluated 38 trees within the busway that could be impacted by 88 geotechnical boring locations, mapped the trees and boring locations using ArcGIS software, and wrote a Tree Assessment Report making recommendations to protect the trees during the boring.

Stephen Wise Temple School, Los Angeles, July 2022

Wrote a Protected Tree Report for the City of Los Angeles Urban Forestry Division outlining tree protection measures for Protected Trees during the construction of a new Early Childhood Center and a fire access road.

CA American Water, Las Lomas Booster Pump Station, Duarte, September 2022

Wrote a Tree Protection Report for the City of Duarte outlining how Protected mature eucalyptus trees will be preserved during booster pump station improvements.

Southern California Gas Company Pipeline Replacement, La Canada, May 2022

Wrote a Tree Protection Report for the City of La Canada Flintridge outlining tree protection measures for Protected Trees on private property during a gas pipeline replacement project. Monitored tree protection measures during construction.

UCLA Campus-Wide Tree Risk Assessments, September 2021 to April 2022

Conducted International Society of Arboriculture Tree Risk Assessments of over 1,000 trees throughout the campus as part of the development of a Master Landscape Plan and wrote a Tree Risk Assessment Report. Tree Location and Risk Information was collected using a GIS-based database software.

California High-Speed Rail Construction Project, April 2022

Wrote a Tree Evaluation Report outlining the impacts a 1,620-foot underground utility trenching could have on a privately-owned almond orchard.

Southern California Gas Company Valve Automation, Granada Hills, February 2022

Wrote a Protected Tree Report for the City of Los Angeles Urban Forestry Division to show how a Protected Tree on private property will be protected during an underground gas pipeline valve automation project.

LA Metro Westside Purple Line Extension Project, December 2021

Evaluated 19 trees that could be impacted by utility confirmatory potholing excavations on the West Los Angeles Veterans Affairs Medical Center property and wrote a Tree Assessment Report outlining recommendations to protect the trees during potholing.

LA Metro and LA County Beaches and Harbors, Bus Turnaround August 2021

Wrote a Tree Assessment Report detailing impacts that could occur to trees and shrubs through the modification of a public parking lot to accommodate a bus turnaround loop, evaluating trees that might be disturbed during the project, and recommending mitigation measures for any risks identified.

LA Metro Westside Purple Line Extension Project, November 2020 to Present

Provide arborist support services including third-party report reviews of construction contractor-prepared documents and conduct tree inventories and nesting bird surveys. Write Tree Inventory and Nesting Bird Reports.

Tree Risk Assessment of a Historic Valley Oak, City of Agoura Hills, August 2020

Conducted a Tree Risk Assessment on a valley oak near the corner of Kanan Road and Agoura Road that had a major limb loss and made recommendations to mitigate the loss.

Los Angeles Regional Interoperability Communications System Land Mobile Radio System, Topanga Peak, Santa Monica Mountains Los Angeles County, August 2020

Wrote an Oak Tree Report to apply for a Coastal Development Oak Tree Report from the Los Angeles County Department of Regional Planning to show how 12 coast live oaks (*Quercus agrifolia*) within a 100-foot buffer around the project site will be protected during replacement of existing equipment and installation of new communications equipment.

Southern California Gas Company Pipeline Repair Project, Sepulveda Community Gardens, Encino, June 2020 to August 2020

Wrote Protected Tree Reports for the City of Los Angeles Recreation and Parks Department and the City of Los Angeles Urban Forestry Division to show how Protected Trees will be protected during underground gas pipeline repairs. Monitored during construction to ensure tree protection measures were adhered to.

Decay Testing and Tree Risk Assessment of a Historic Valley Oak, City of Westlake Village, November 2019

Conducted resistance drilling testing using a Resistograph® tool to measure the relative density of wood in the trunk of a valley oak and conducted a Tree Risk Assessment identifying, analyzing, and evaluating the risk of the tree.

Tree Risk Assessments, City of El Monte Public Works, El Monte, August 2019

Conducted Tree Risk Assessments on 29 mature lemon-scented eucalyptus trees in the center median planters of Garvey Avenue.

Protected Tree Report, Las Virgenes Municipal Water District, Chatsworth, July 2019

Wrote a Protected Tree Report showing how 56 trees that have Protected status will be protected during the Twin Lakes Pump Station Pipeline Installation Project.

*The American Society
of
Consulting Arborists*

*in recognition of fulfillment of the requirements for
Registered Consulting Arborist® status*

confers upon

Ted Lubeshkoff, RCA #513

Registered Membership

12/19/2011



Dr. James R. Clark, RCA #357
President

Beth W. Palye, FASAE, CAE
Executive Director

SITE PLAN

721 Tree Number

Tree Location

Tree Protection Fence

All seven trees are Mexican fan palms (*Washingtonia robusta*).

Everett Street

North

Sunset Boulevard

Marion Avenue

COLOR LEGEND

- PROPOSED BUILDINGS
- EXISTING BUILDINGS
- DEMOLISHED BUILDINGS

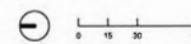


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SUNSET & EVERETT
LOS ANGELES, CALIFORNIA # 2022-0634

CONCEPT DESIGN // PIXEL
JULY 5, 2023



This Site Plan is an attachment to a Protected Tree Report, dated August 31, 2023, prepared by JTL Consultants, Consulting Arborists, Duarte, CA (626) 358-5690 JTLconsultants.com

Attachment D:

South Environmental Biologist's Resumes

EDUCATION

B.S., Wildlife Ecology, University of Wisconsin-Madison, 2004

CERTIFICATIONS

Certified Wildlife Biologist, The Wildlife Society 2014

Certified Technical Service Provider (TSP) for Fish and Wildlife Management Plans, USDA NRCS 2017

Authorized Desert Tortoise Biologist – Numerous BOs

Unmanned Aircraft System Pilot Certification, FAA #4177603

TRAINING

Wetland Delineation Training Course – The Wetland Institute (2014)

Southwest Willow Flycatcher Workshop, 2017

USGS Desert Tortoise Health Assessment and Tissue Collection Techniques Training, 2009

Matthew South

PRINCIPAL BIOLOGIST

Matthew South founded South Environmental in 2018. He is a certified wildlife biologist with over 18 years of professional experience providing natural resources consulting services for a wide variety of clients that include residential, commercial, government, utility, infrastructure, research, and non-profit projects. For the last 15 years, Mr. South has been an environmental consultant in southern California acting as a Wildlife Biologist and Geographic Information System (GIS) Analyst. In early 2018 he started South Environmental and has since been supporting clients in Los Angeles, Ventura, Santa Barbara, San Bernardino, and Riverside Counties.

Mr. South's background in ecology has led to a passion for conservation planning and resources assessments for the purpose of preservation and management. The integration of the latest technologies such as advanced GIS systems, mobile computing, and drone sensing allows him to innovate new data collection, analysis, and collaboration tools for the environmental sciences that produce more accurate data and better-informed resource managers.

EXPERTISE

- **Conservation and Management Planning.** Mr. South's has extensive experience preparing mitigation and monitoring plans, habitat conservation plans, and technical biological resources management plans that are compliant with federal, state, and local regulations. Mr. South is the only active NRCS TSP for Fish and Wildlife Plans Certified in California.
- **Biological Resources Assessment.** Mr. South has completed dozens of biological resources assessments throughout southern California.
- **Rare Plants and Arborist Services.** Mr. South has surveyed and assessed thousands of native and landscaped trees in southern California. He is a certified arborist with 5-years of tree survey experience working closely with some of the most experienced arborists in California. In addition, he has performed hundreds of hours of rare plant surveys and habitat assessments.
- **Wetland & Jurisdictional Delineations.** Mr. South has conducted dozens of jurisdictional and wetland delineations per the guidelines and methods from the US Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and the state Regional Water Quality Control Boards (RWQCB).
- **GIS.** Mr. South is an expert at spatial data collection and analysis using ESRI mobile and desktop software products and Trimble hardware.

SELECT PROJECT EXPERIENCE

St. Andrews Recreation Center Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to conduct a Biological Resources Assessment (BRA) and Tree Survey Report for the St. Andrew's Recreation Center at 8701 S St. Andrew's Place in the City of Los Angeles, California for development on one parcel (Assessor's Identification Number [AIN] 6036-009-900) owned by the City of Los Angeles and administered by the Department of Recreation and Parks (RAP). The parcel (study area) is in the Empowerment Congress Southwest Area Neighborhood Council in the south-central part of the City and within the South Los Angeles Community Plan Area. This report identified sensitive or protected biological resources on the parcel and indicated the regulations governing these resources. The biological resources of the parcel was assessed based on a literature review and a field site survey. The Tree Report included a description of the survey area; methods used to survey the trees involving assessment of tree structure, health, and mapping; and the results of the survey including photographs of each tree.

Bronson Canyon Playground Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to prepare a BRA, jurisdictional delineation, and rare plant survey for the City of Los Angeles RAP Bronson Canyon Playground Project located at 3200 Canyon Drive in the City of Los Angeles, California, for the proposed construction of a playground and access improvements including a new pedestrian walkway on a parcel owned by the City of Los Angeles in Griffith Park with the Assessor's Identification Number [AIN] 5583-025-900. The BRA identified and assessed the potential impacts to sensitive or protected biological resources on the project site (development areas and associated work areas), indicated the regulations governing these resources, and discussed recommendations for avoiding or mitigating these impacts. The biological resources of the project site were assessed based on a literature review and a field site survey.

Bell Creek Brush Clearance Project, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to prepare an Invasive Plant Treatment and Monitoring Plan (plan) detailing the proposed actions to compensate for the temporary impacts to plant communities from the Bell Creek Brush Clearance Project under a Lake and Streambed Alteration Agreement. The implementation of the plan was consistent with measures included in that agreement, including measure 2.22 regarding invasive species management being conducted to ensure protection of the existing wildlife habitat. Implementation of clearance activities under the plan were designed to reduce the presence of and prevent the spread of non-native and invasive plant species within the Bell Creek area. The plan outlined monitoring and treatment methods to control the spread of non-native and invasive plant species in the project treatment areas and identified priority species and priority treatment areas to focus efforts and resources toward achieving the final success criteria. The biological resources of the parcel were assessed based on a literature review and a field site survey.

Various Locations, WEAP Trainings and Nesting Bird Surveys, City of Los Angeles Department of Recreation and Parks, California (2023). South Environmental was retained to provide Worker Environmental Awareness and Protection (WEAP) Trainings, field survey, monitoring, and reporting, for several City of Los Angeles RAP locations. South Environmental prepared a contractor education brochure in English and Spanish that provided information on protecting nesting birds and included pictures of sensitive plants and wildlife (particularly bats) occurring within the project areas. South Environmental also conducted environmental awareness training to Department inspectors, contractors, and subcontractors at the project site prior to the start of brush clearance activities. South Environmental also conducted as-needed nesting bird surveys, established buffer zones, and performed biological monitoring in response to the presence of active



nests. A brief letter report to RAP was prepared to document field observations, protective measures implemented, and the overall success of the measures.

Sepulveda Basin Prescribed Burn Project, City of Los Angeles Department of Recreation, Los Angeles, California (2022). South Environmental was retained to prepare a burrowing owl survey report for use by the City of Los Angeles RAP for the proposed prescribed burning of approximately 86.49 acres of undeveloped areas on the Sepulveda Basin Apollo XI/Valley Fliers Airfield and adjacent lands. Several active burrowing owl (*Athene cunicularia*) burrows were identified in October 2021 (survey area) during general surveys conducted to support the project in the early planning phase. This report was prepared according to Appendix C and Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation. The report included a description of the project, biological setting, vegetation communities, survey methodology, and survey results that include burrowing owl behavior observations, and recommendations for project implementation that would avoid impacts to burrowing owls and active burrows.

Various Biology Reports within City of Los Angeles (2019-present). Mr. South has prepared and overseen the preparation of dozens of biological resources assessment reports within the City of Los Angeles. These reports are prepared within the range of the population of mountain lions that is the target of the listing status, in the Santa Monica Mountains, San Gabriel Mountains, Simi Hills, and Verdugo Hills. Numerous other projects have been completed that are not listed. Select Projects include:

- Baseline Road in LaVerne
- Altadena Hills Project
- 16 Beverly Park
- 64 Beverly Park
- 74 Beverly Park
- 79 Beverly Park
- Toyopa Drive
- Mapleton Drive
- Tigertail
- 680 Sarbonne
- 777 Sarbonne
- Stradella Road
- Tower Grove
- Bella Drive
- Chautauqua Boulevard
- Benedict Canyon
- Haslam Terrace
- Summitridge Drive
- Rial Lane
- Outpost Ave
- Pasquera
- Beverly Grove
- Multiple Granito Drive Projects
- Floral and Electra Drive Project
- Hillside
- Magnolia
- Swallow
- Sierra Mar
- Beverly Grove
- Stradella
- Chalon Road
- Moraga
- Brentridge
- Viewcrest
- Old Chimney Road
- Multiple Developments on Mulholland Highway
- Berkley Hall School Project
- Charmel Lane
- Paseo Miramar Roadway Project
- Posetano-Revello Project
- Palmera
- Shadow Mountain Drive
- Astral Project
- Nofral Road Projects
- San Onofre Drive
- Crescent Drive

Attachment 2



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July 10, 2024

VIA EMAIL

President Monique Lawshe and Honorable Members of the
City Planning Commission
City of Los Angeles
201 N. Spring Street, Room 272
Los Angeles, CA 90012
cpc@lacity.org

Re: Sunset and Everett Project (Case Nos. CPC-2023-5528-DB-SPR-MCUP-HCA and ENV-2023-5529-SCEA)

Dear President Lawshe and Honorable Commissioners:

We represent Aragon (Sunset/Everett) Properties Corporation (“Applicant”) in conjunction with its proposal to construct a new mixed-use development containing 327 residential dwelling units, inclusive of 41 Very Low Income affordable units, and approximately 9,462 square feet of commercial uses (“Project”) on a 2.46-acre site located at the intersection of Sunset Boulevard and Everett Street (“Site”) in the Los Angeles (“City”). We have reviewed the letter submitted by Supporters Alliance for Environmental Responsibility (“SAFER”) dated July 8, 2024 (“SAFER Letter”) challenging the adequacy of the Sustainable Communities Environmental Assessment (“SCEA”) prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”) and Senate Bill (“SB”) 375. The SAFER Letter reiterates several of the comments stated in its letter dated April 15, 2024 without introducing new evidence or arguments. Comprehensive responses to SAFER’s April 15, 2024 comments are included in the memorandum submitted by CAJA Environmental Services, Inc. dated June 11, 2024 (“Responses to Comments”) and attached to the staff report prepared for the Project’s July 11 hearing before your Commission. We briefly reiterate some of these previous responses herein to address SAFER’s repeated attempts to ignore the plain statutory language and policy considerations of SB 375 and CEQA.

First, contrary to SAFER’s insistence, the statutory qualifying criteria for a transit priority project that may be analyzed with a SCEA, as established by SB 375 and Public Resources Code Section 21155(a), do not require consistency with *local* planning and zoning designations and regulations, but instead require consistency with the general use designation, density, building intensity, and applicable policies of the *region’s* sustainable communities strategy, which here is SCAG’s 2020-2045 *Regional Transportation Plan/Sustainable Communities Strategy* (“RTP/SCS”). Both the Project’s SCEA (see Section 2.1) and the Responses to Comments provide substantial evidence of the Project’s consistency with the RTP/SCS. SAFER’s claim is therefore without merit.

SAFER further claims that the Project's density bonus law requests render it inconsistent with the General Plan and zoning, further impairing use of a SCEA. As explained above, consistency with local planning and zoning regulations is not a prerequisite for utilization of a SCEA. Notwithstanding, the Project is consistent with the City's General Plan and zoning, because as explained in the Responses to Comments, State law explicitly provides that density bonus requests do not result in any inconsistency with local planning and zoning regulations (Government Code Section 65915(f)(5) and 65915(j)(1)). This assertion by SAFER also lacks merit.

SAFER next repeats its claim that because the Project has not incorporated every mitigation measure identified in the RTP/SCS program EIR it does not qualify for a SCEA. As explained in the Responses to Comments, mitigation measures are not required for effects which are not found to be significant (CEQA Guidelines Sections 15126.4(a)(3)), and a lead agency only has authority to require mitigation to substantially lessen or avoid significant effects on the environment, consistent with applicable constitutional requirements (CEQA Guidelines Section 15041). Furthermore, the RTP/SCS program EIR itself specifies that lead agencies shall only require mitigation measures as appropriate to address potential impacts. In compliance with these requirements, the SCEA identifies the applicability of each mitigation measure contained in the RTP/SCS program EIR to the Project.

SAFER also repeats its claim that the Project must incorporate every goal, policy, and strategy identified by the RTP/SCS to be deemed consistent. Specifically, SAFER asserts that an RTP/SCS strategy directed towards public agencies to promote community micro-power grids must be understood as a mandate for the Project to itself implement all the features of a community micro-power grid. As explained in the Responses to Comments, this proposition is not supported by applicable case law, which requires *general* consistency with the overall intent of the plan or regulation in question. As demonstrated by the SCEA by substantial evidence, the Project is consistent with the applicable policies of the RTP/SCS and would not preclude the attainment of its primary goals.

Lastly, SAFER's comments continue to incorrectly conflate principles associated with tiering from a program EIR, which involves the question of whether a subsequent action is consistent with the programmatic actions analyzed in the program EIR, with the Project's utilization of a SCEA. A SCEA is a distinct CEQA streamlining tool created by separate statute and is subject to an entirely different set of criteria and standards than those associated with tiering. As demonstrated, the SCEA meets all statutory requirements. Despite SAFER's repeated claims, CEQA tiering concepts and case law do not apply to SCEAs.

Given SAFER's repeated misapplication of SB 375 and CEQA generally, we request that this Commission reject SAFER's comments, and approve the Project and its associated SCEA.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Todd Nelson', with a stylized flourish at the end.

Todd Nelson
Partner
of RAND PASTER & NELSON, LLP

cc: Esther Ahn, Department of City Planning
Heather Bleemers, Department of City Planning