

Mr. Ben Golshani
VNB, LLC
October 25, 2023

Subject: Executive Summary for Responses to SWAPE Comments on Air Quality, Greenhouse Gas, and Noise Study for a Six-Story Mixed Use Development in Los Angeles, CA

As discussed in the attached letter, it was determined that the SWAPE analysis was flawed, contained false statements, and the project would not exceed any applicable CEQA significance thresholds.

As the official assessment methodology for land use projects in California, CalEEMod was relied upon for construction and operational emissions quantification, which forms the basis for the Air Quality impact analysis performed by Yorke. CalEEMod Defaults have been used in all places except those explained in the letter. Thus, all changes to model defaults are justified.

SWAPE used an obsolete version of CalEEMod (Version 2020.4.0), which has been superseded by CalEEMod 2022, the correct version used by Yorke in 2022 for the air quality analysis. Additionally, SWAPE has made unsubstantiated changes to the inputs in their obsolete CalEEMod run.

The analysis provided by SWAPE is based on AEP and White Paper's metrics. However, the SWAPE's comparison to this "threshold" is misleading, as this conceptual criterion has not been officially adopted by the SCAQMD, the State, or the City.

The statement in the comment letter that the future residents and employees of the Project will be exposed to a high cancer risk from formaldehyde is based on false assumptions. Formaldehyde is readily biodegradable and complete degradation of formaldehyde can be accomplished in less than 30 days, and formaldehyde in the air can be degraded in less than 4 days. Thus, most, if not all, formaldehyde residue in furniture, fixtures, and floors can be expected to be off gassed and released shortly after manufacture. Additionally, given the federal and state regulations limiting formaldehyde emissions from building materials, neither residents nor workers on the Project site will be exposed to dangerous levels of formaldehyde emissions over the long term.

The estimated diesel particulate matter (DPM) emissions from the construction phase are small and short term, and no substantial localized DPM emissions from the operational phase of the project is expected since the fleet mix consists mainly of passenger cars and light-duty trucks (gasoline and electric, hence de minimis DPM emissions). Thus, consistent with similar non-industrial projects, Health Risk Assessment is not required for this project.

Although labeled as "mitigation measures" or "control measures", noise barriers are project design features, i.e., required Best Management Practices (BMPs). LA City Planning approved BMPs will be implemented in compliance with the Los Angeles Municipal Code requirements. This is a standard Condition of Approval and pursuant to CEQA, is not considered mitigation.

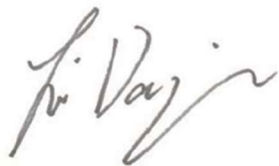
Shielding is not the only BMP that will be implemented. The other LA City Planning approved BMPs will also be implemented. Aggregated average construction noise is not expected to exceed

the applicable limits set by the City at nearby receptors. Therefore, impacts would be less than significant.

The statement that the project could result in a doubling of traffic is not true because it does not take into account the contemporaneous decrease in commercial business traffic and the proportionally smaller size of the proposed Project. No significant net increase in traffic is expected due to this residential project that replaces commercial land uses. Since the Project is on a major urban street, the incremental effect of Project operation would not be quantifiable against existing traffic noise (background) in the Project vicinity. Since the Right Rail is on Van Nuys Blvd, it is more convenient and economical for tenants and employees to use that in comparison with the situation that they live elsewhere and would be compelled to use cars. This will reduce the traffic in the vicinity. Therefore, impacts would be less than significant.

Furthermore, Pursuant to Section 15204 of the State CEQA Guidelines, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the [Environmental Impact Report] EIR." As such, the additional analysis, as suggested by the commenter, is not warranted or required. The Proposed Project's Air Quality, GHG, and noise impact would still be less than significant with respect to applicable CEQA criterion.

Sincerely,



Tina Darjzanie | Long Beach Office
Senior Engineer
Yorke Engineering, LLC
TDarjzanie@YorkeEngr.com

cc: Bradford Boyes, Yorke Engineering, LLC

October 25, 2023

Mr. Ben Golshani
Manager
VNB, LLC
Work: (213) 718-2416
E-mail: Ben@VNBLLC.com

Subject: Responses to SWAPE Comments on Air Quality, Greenhouse Gas, and Noise Study for a Six-Story Mixed Use Development in Los Angeles, CA

Dear Mr. Golshani:

Yorke Engineering, LLC (Yorke) has completed its review of comments provided by Soil-Water-Air Protection Enterprise (SWAPE) in its letter dated October 19, 2023. Yorke's responses are provided in [blue](#).

PROJECT DESCRIPTION

VNB, LLC. is proposing to develop a six-story mixed use development project that includes retail, parking, and residential, to be located at 7115-31 North Van Nuys Boulevard in the City of Los Angeles, CA (the City). The proposed development is located on 47,219 square feet of land within the jurisdiction of South Coast Air Quality Management District (SCAQMD) in Los Angeles County. The six-story development will include a two-level basement parking garage with elevator, retail and parking areas on the ground floor, and residential units and amenities on the second to sixth levels. The 1.084-acre project site is located on developed land and construction will involve the demolition of two existing buildings and asphalt pavement. The building footprint will be approximately 36,000 square feet and landscaping will be approximately 11,940 square feet. The project site is bounded by Van Nuys Boulevard on the east, Sherman Circle on the west, Gault Street on the South, and retail buildings on the north. The project site is surrounded by a mix of existing commercial/retail and high-density residential land uses. The nearest sensitive receptors are apartment complexes approximately 85 feet (26 meters) west of the project site.

SUMMARY OF FINDINGS

As discussed below, it was determined that the SWAPE analysis was flawed, contained false statements, and the project would not exceed any applicable CEQA significance thresholds.

AIR QUALITY IMPACT ANALYSIS

Comment (I.a.):

1. Failure to Provide Complete CalEEMod Output Files;

Response: This statement is objectively false. Detailed CalEEMod 2022 output file printouts were attached to the back of the July 27, 2022, technical report (Attachment 1).

2. Unsubstantiated Changes to Individual Construction Phase Lengths;

Response: CalEEMod 2022 default construction phase lengths were used for the Demolition, Site Preparation, Grading, Building Construction, and Paving phases. Refer to the User Guide for CalEEMod Version 2022.1, Appendix G, Default Data Tables, Worksheet G-7. As the official assessment methodology for land use projects in California, CalEEMod was relied upon for construction and operational emissions quantification, which forms the basis for the Air Quality impact analysis performed by Yorke. Since criteria pollutant impacts are evaluated on a daily maximum basis (pounds per day), construction phase length (total working days per phase) does not factor into the criteria pollutant significance determination.

The only construction phase for which the duration was adjusted was the last phase in the sequence, Architectural Coating (painting). Based on experience, the architectural coating of a building that size (214 dwelling units) requires about 40 working days, averaging 5 to 6 dwelling units per day, depending on painting crew size. VNB will ensure that architectural coating will be done over a course of approximately 8 weeks (40 working days). All coatings used will be SCAQMD Rule 1113 compliant to control VOC emissions.

3. Unsubstantiated Amount of Required Demolition; and

Response: The square footages of old buildings, asphalt, and concrete to be demolished were based on data contained in the Architectural Drawings (Sheet A-1.1). CalEEMod calculates by default the estimated daily number of haul truck trips needed to remove demolition debris from the project site. CalEEMod also calculates, by default, fugitive dust emissions from building demolition for land use types. The calculation of fugitive dust emissions during demolition is derived from the methodology described in the report prepared for the USEPA by Midwest Research Institute (MRI) (1988).

4. Unsubstantiated Changes to Operational Wastewater Values.

Response: CalEEMod default operational wastewater values were used; no changes were made. CalEEMod default water consumption estimates are automatically generated for all land use subtypes. Outdoor water consumption defaults are calculated using the Maximum Applied Water Allowance (MAWA) method established under the California Department of Water Resources' (DWR) 2015 MWELO (California Code of Regulations [C.C.R.], Title 23, Division 2, Chapter 2.7). Indoor water consumption defaults are based on studies published by the Water Research Foundation (2016), Pacific Institute (Gleick et al. 2003), and American Water Works Association (Dziegielewski et al. 2000). The quantity of indoor water is used to estimate the amount of wastewater generated. Refer to the User Guide for CalEEMod Version 2022.1, Appendix G, Default Data Tables, Worksheets G-30 through G-36.

GREENHOUSE GAS IMPACTS ANALYSES

1. *Incorrect and Unsubstantiated Quantitative Analysis of Emissions;*
2. *Incorrect Reliance on an Outdated Quantitative GHG Threshold; and*
3. *Failure to Identify a Potentially Significant GHG Impact.*

Comment: SWAPE explains that pursuant to the Association of Environmental Professionals (“AEP”) Guidance, “[F]or evaluating projects with a post 2020 horizon, the threshold will need to be revised based on a new gap analysis that would examine 17 development and reduction potentials out to the next GHG reduction milestone.” Provided how the Project was introduced in October 2022, thresholds for 2020 “are not applicable to the proposed Project and should be revised to reflect the current GHG reduction target.” As a result of these shortcomings in Yorke’s analysis, the construction and operational emissions conclusions in the Project’s Categorical Exemption cannot be relied upon to determine the significance of the Project’s air quality or GHG impacts.

Response: The analysis provided by SWAPE is based on AEP’s “2030 Land Use Efficiency Metrics” of 3.0 MT CO₂e/SP/year. However, the SWAPE’s comparison to this “threshold” is misleading, as this conceptual criterion has not been officially adopted by the SCAQMD, the State, or the City. The AEP is a non-profit organization of interdisciplinary professionals, which does not promulgate or enforce standards or regulations, but instead develops guidance documents addressing environmental issues with respect to CEQA.

AEP also references its 2016 White Paper, *Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*. These are personal opinions of the authors and do not represent the opinions or judgment of their respective firms, agencies, or of the AEP. The White Paper provides suggested GHG thresholds and GHG reductions targets, but these are not regulatory standards, nor do they constitute legal advice. Additionally, this White Paper was published in October 2016, prior to the *2017 Scoping Plan*. Statewide GHG goals have since been updated in the *2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan)*, which supersedes the *2017 Scoping Plan*.

AEP’s Statewide GHG per capita goal is also an inappropriate comparison because it based service population on California residents only. There are many factors contributing to the Project’s total GHG emissions that are unrelated to the on-site residential population only. For example, the commercial uses include local serving retail land uses that would be utilized by persons residing in the surrounding area. Thus, it would be erroneous to compare a State-level target to an individual development project in metropolitan Los Angeles. Since it is unknown the precise number of patrons and guests that would utilize the Proposed Project annually, it would be erroneous to calculate the emissions per service population without factoring in the number of patrons and guests of the Project Site. Therefore, the commenter’s calculation and reasoning above is based on inaccurate assumptions.

Pursuant to Section 15204 of the State CEQA Guidelines, “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers,

as long as a good faith effort at full disclosure is made in the [Environmental Impact Report] EIR.” As such, the additional analysis of service population emissions, as suggested by the commenter, is not warranted or required. The Proposed Project’s GHG emissions impact would still be less than significant with respect to SCAQMD criterion.

Comment: SWAPE explains, “the CalEEMod User’s Guide requires any changes to model defaults be justified.” Here, however, the analysis does not provide a justification for making such substantial changes.

Response: CalEEMod Defaults have been used in all places except those explained above and in the report. Thus, all changes to model defaults are justified.

Comment: *b. The Project will have Potentially Significant Outdoor Air Quality Impacts. When SWAPE updated the input parameters used in CalEEMod Version 2020.4.0 and reran the model, the “updated analysis estimates that the Project’s construction-related VOC emissions would exceed the applicable South Coast Air Quality Management District (“SCAQMD”) threshold of 75-pounds per day (“lbs/day”).”*

Response: SWAPE used an obsolete version of CalEEMod (Version 2020.4.0), which has been superseded by CalEEMod 2022, the correct version used by Yorke in 2022 for the air quality analysis.

Additionally, SWAPE doesn’t say that they themselves made unsubstantiated changes to the inputs in their obsolete CalEEMod run. The SWAPE changes (increases) to the CalEEMod land use sizes, i.e., acres of grading larger than the 1.084-acre Project site, are documented below:

CalEEMod Version: CalEEMod.2020.4.0

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Date: 6/9/2023 1:15 PM

7115 Van Nuys Boulevard - Los Angeles-South Coast County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4	Building Construction	Building Construction	8/31/2022	6/6/2023	5	200
5	Paving	Paving	6/7/2023	6/20/2023	5	10
6	Architectural Coating	Architectural Coating	6/21/2023	7/4/2023	5	10

Acres of Grading (Site Preparation Phase): 1.88

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 360,972; Residential Outdoor: 120,324; Non-Residential Indoor: 23,700; Non-Residential Outdoor: 7,900; Striped Parking Area: 5,402 (Architectural Coating – sqft)

Comment: Project would have a significant GHG impact because “the Project’s service population efficiency value exceeds the SCAQMD 2035 efficiency target of 3.8 MT CO₂e/SP/year, indicating a potentially significant impact.”

Response: The response to this comment has already been provided above. This “threshold” has not been adopted by the SCAQMD, State, or City. See above for more details.

INDOOR AIR QUALITY IMPACT ANALYSIS

Comment: c. The Project will have significant indoor air quality impacts.

Response: According to the U.S. National Library of Medicine's Hazardous Substances Database, formaldehyde is readily biodegradable and complete degradation of formaldehyde can be accomplished in less than 30 days, and formaldehyde in the air can be degraded in less than 4 days. Thus, most, if not all, formaldehyde residue in furniture, fixtures, and floors can be expected to be off gassed and released shortly after manufacture (i.e., within 30 days), meaning that the amount of formaldehyde residue in indoor air upon occupancy will be at zero within 30 days or sooner, particularly considering product transportation and distribution time prior to installation at a project site. Cancer effects are produced following extensive, long term exposures for a period of usually more than 7 years. Wood -pressed furniture and flooring would not have enough formaldehyde to offgas for that length of time (or any length of time generally exceeding 5 days).

Additionally, the use of formaldehyde in composite wood products is regulated by the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) through the following laws and regulations:

- Toxic Substances Control Act;
- Resource Conservation and Recovery Act;
- Clean Water Act;
- Clean Air Act;
- National Emission Standards for Hazardous Air Pollutants (NESHAP) under the CAA;
- Control of Hazardous Air Pollutants from Mobile Sources; and
- CARB Airborne Toxic Control Measure.

As noted above, there are various regulations that address formaldehyde concentrations. The approach and analysis in the comment is not consistent with CARB's approach for regulating building materials, as CARB has specific requirements for reducing health risk from formaldehyde emissions from building materials. Thus, formaldehyde emissions from project building materials would be controlled.

As indicated above, the amount of formaldehyde released from building materials is reduced exponentially over time. The Offermann memo nonetheless incorrectly assumes that the same concentration of formaldehyde will be present year-after-year over a 30-year period. In reality, indoor air concentrations of formaldehyde are likely due to various sources, and the formaldehyde that originates from the project building materials will decrease substantially over a short period of time, as described above. Thus, the statement in the comment letter that "... future residents of the Project will be exposed to a cancer risk from formaldehyde of approximately 120 per million, even assuming all materials are compliant with the California Air Resources Board's ("CARB") formaldehyde airborne toxics control measure" and that "...employees of the Project's commercial spaces will be exposed to a cancer risk of 17.7 per million from formaldehyde emissions." is based on false assumptions. Given the federal and state regulations limiting formaldehyde emissions from building materials, neither residents nor workers on the Project site will be exposed to dangerous levels of formaldehyde emissions over the long term.

HEALTH RISK ASSESSMENT

Comment: The City failed to analyze the additional impacts of motor vehicle traffic and the subsequent increase in exposure to particulate matter (“PM_{2.5}”). In 1998, the State of California identified diesel particulate matter (“DPM”) derived from diesel-powered engines as a Toxic Air Contaminant (“TAC”) based on its potential to cause cancer. DPM is typically composed of carbon particles and a variety of organic compounds including more than 40 known cancer-causing organic substances.

Response: CalEEMod quantifies fugitive PM₁₀ and PM_{2.5} and exhaust PM₁₀ and PM_{2.5} for both construction and operational phases of the project. CalEEMod automatically pre-populates the roadway and vehicle characteristic fields based on USEPA’s AP-42 (2006b, 2011) and CARB’s EMFAC vehicle emissions model, respectively. CalEEMod calculates road dust, engine exhaust, and mechanical (i.e., tire wear and brake wear) emissions from trips and vehicle miles traveled (VMT) for project construction and operation using vehicle fleet mixes.. CalEEMod quantifies operational mobile source emissions for different land use types, including residential and commercial. The number of trips affect the calculation of starting exhaust and evaporative emissions. The VMT affects the calculation of running exhaust, brake wear, tire wear, and fugitive dust from paved and unpaved roads. CalEEMod defaults were used in the construction and operational mobile source analyses.

The proposed project is a mixed use residential and commercial project. Neither of these land uses would generate substantial levels of operational heavy-duty diesel truck traffic. The estimated diesel particulate matter (DPM) emissions from the construction phase are small and short term, and no substantial localized DPM emissions from the operational phase of the project is expected since the fleet mix consists mainly of passenger cars and light-duty trucks (gasoline and electric, hence de minimis DPM emissions). Thus, consistent with similar non-industrial projects, Health Risk Assessment is not required for this project.

NOISE IMPACTS ANALYSES

Comment: II. Exemptions from CEQA are Prohibited Where Mitigation Measures are Required to Reduce a Project’s Possible Significant Impacts.

A project that requires mitigation measures cannot be exempted from CEQA, nor can the agency rely on mitigation measures as a basis for determining that one of the significant effects exceptions does not apply... Here, the City’s noise analysis discloses that mitigation measures were assumed to apply when concluding the Project’s noise impacts would be less-than-significant.

Response: Although labeled as “mitigation measures” or “control measures”, these are project design features, i.e., required Best Management Practices (BMPs). LA City Planning approved BMPs will be implemented in compliance with the Los Angeles Municipal Code (LAMC) requirements. This is a standard Condition of Approval and pursuant to CEQA, is not considered mitigation. Therefore, impacts would be less than significant.

Comment: III. The Project Does Not Qualify for CEQA’s Infill Exemption Due to Potentially Significant Noise Impacts.

“...the City’s noise analysis improperly assumed a 5-15 dBA of noise reducing from shielding. While this reduction may occur for receptors at the same height as the shield, “there is no effect for upper floor receivers.”

Response: In order to be conservative, only a 5 dBA reduction was applied, although an Insertion Loss coefficient of at least 5 dBA for flexible curtains, 8 dBA for rigid plywood fencing, or 10 dBA in combination can be applied (FHWA 2006). For the more noise-intensive ground-level demolition, site preparation, and grading phases, the noise barrier is assumed to be as high as practicable and therefore all receptors are expected to receive the same shielding effects. Once the demolition, site preparation, and grading phases are completed, construction noise is expected to diminish because heavy demolition and earthmoving equipment will no longer be used on the Project site.

Also, shielding is not the only BMP that will be implemented. The other LA City Planning approved BMPs, which are defined by the LAMC and listed in the Noise analysis section of the technical report, will also be implemented. The effects of these additional BMPs cannot be readily quantified but will further reduce the noise. Aggregated average construction noise is not expected to exceed 75 dBA at nearby receptors, which is below the construction significance threshold set by the City.

Please note that per the LAMC Section 112.05, the 75 dBA construction noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the 75 dBA limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. However, the burden of proof of technical infeasibility is placed upon the person or persons generating the noise, i.e., the contractor and owner or owner’s agent.

Comment: The analysis failed to take baseline noise measures to establish existing environmental conditions. Instead, the analysis states that it relied on the Federal Highway Administration (“FHWA”) model, which Wilson Ihrig explains cannot serve as a reliable model “as it only models noise from a single point, not a line-source such as from a roadway.”

Response: Based on experience with similar projects, it is our professional opinion that baseline noise measures to establish existing environmental conditions are not required for a screening-level analysis and FHWA noise model estimates, supplemented by other cited references, are sufficient and representative of the baseline sound environment in the urbanized project area. Yorke has conducted these types of screening-level noise assessments for urban residential and commercial projects in Los Angeles without the need for baseline noise measurements. The Project site is in the City of Los Angeles, Los Angeles County, in a characteristically urban and densely populated area subject to noise from local traffic on public streets (Van Nuys Boulevard and Sherman Circle), buses, trains, construction, and small power equipment (e.g., lawn mowers, edger, etc.). The FHWA noise model puts the expected daytime ambient noise from known sources at about 64 dBA at the nearest sensitive receptor to the proposed Project. This model is based on traffic from nearby roadways, as well as a general 40 dBA urban background noise. Also, refer to “traffic” and “traffic noise” below.

Comment: Operational noise assessment is incomplete and instead relies on an improper comparison between the existing HVAC systems and one proposed by the Project. Whereas the existing HVAC equipment for two fast-food restaurants are situated approximately twenty feet high, the Project's proposed HVAC system will be situated on top of a six-story structure to accommodate over 200 residential units. Wilson Ihrig suggests a full operational analysis to be conducted in order to better understand the Project's noise impacts on nearby apartments and whether such noise levels generated by the proposed HVAC system would exceed significance thresholds.

Response: The noise section of the technical report states that the overall noise levels generated by the new HVAC equipment are not expected to be substantially greater than generated by older HVAC equipment installed on existing buildings *near* the Project site, i.e., the large apartment complex on Sherman Circle. This apartment complex is approximately 85 feet west of the project site consisting of five-story residential buildings. The HVAC equipment on these buildings are roof-mounted, above the dwelling units. As such, the new roof-mounted HVAC equipment associated with the proposed six-story Project would not represent a substantially new type or source of noise in the general vicinity. Because the multi-residential HVAC equipment is roof-mounted, condenser fan noise dissipates mainly upward, away from residents, well above street level. In addition, the operation of this and any other on-site stationary sources of mechanical noise would be required to comply with the LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties, e.g., nearby residential buildings, by more than 5 dBA. Such equipment is designed to meet this standard. Thus, this does not need to be evaluated further.

Comment: The Project fails to consider any noise impacts related to traffic noise. As Wilson Ihrig points out, the document does not include any analysis related to traffic noise. In fact, Wilson Ihrig explains that "considering there is only one other large apartment complex on Sherman Circle, it is not unreasonable to assume that the new project could result in a doubling of traffic, with is typically a 3 dBA increase", and which would typically be considered a significant impacts in other jurisdictions.

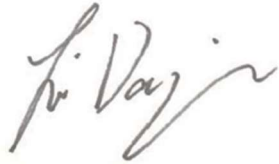
Response: The proposed 214-unit Project is smaller than the existing large apartment complex on Sherman Circle, which is approximately 300 units. There are existing commercial businesses (high turnover restaurants) on the project site that will be replaced by the residential Project. The statement that the project could result in a doubling of traffic is not true because it does not take into account the contemporaneous decrease in commercial business traffic and the proportionally smaller size of the proposed Project. No significant net increase in traffic is expected due to this residential project that replaces commercial land uses. Since the Right Rail is on Van Nuys Blvd, it is more convenient and economical for tenants and employees to use that in comparison with the situation that they live elsewhere and would be compelled to use cars. This will reduce the traffic in the vicinity. Since the Project is on a major urban street, Van Nuys Boulevard, the incremental effect of Project operation (possible slightly increased traffic noise) would not be quantifiable against existing traffic noise (background) in the Project vicinity (i.e., less than significant impact).

VNB, LLC
7115-7131 Van Nuys Boulevard, Los Angeles, CA 91405
October 25, 2023
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CLOSING

Thank you very much for the opportunity to be of assistance. Should you have any questions, please contact me at (949) 324-9041 (mobile) or Bradford Boyes at (805) 217-4947 (mobile).

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tina Darjzanie', with a stylized flourish at the end.

Tina Darjzanie | Long Beach Office
Senior Engineer
Yorke Engineering, LLC
TDarjzanie@YorkeEngr.com

cc: Bradford Boyes, Yorke Engineering, LLC

VNB, LLC
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